

Template for Equality Impact Assessment of Policies and Procedures.

This template is designed to support the process of conducting an Impact Assessment and is based upon guidelines produced by the Commission for Racial Equality (see: http://www.cre.gov.uk/duty/reia/how_stage2.html)

Policy under review: Mental Health and Social Inclusion Strategy for Gloucestershire	Date of assessment: 11 th August 2008 – initial assessment 19 th November 2008 – final assessment	Names of assessors: Carol Sparks Ian Gregory
Consider:	Assessment: Please see guidance on page 8	Action to be taken:
What are the aims of the policy?	The overarching aim is to 'Work together to reduce mental health inequalities and improve opportunities by engaging individuals and communities in decisions that will improve their quality of life'. This will be done by Promoting the well being and social inclusion of all citizens of Gloucestershire with mental health problems Enabling people with mental health problems to live as full and equal citizens of their local communities Satisfying the requirements of national policy Providing a framework to enable engagement with strategic partners	None

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<p>Is there any evidence that some groups could be adversely affected? If there is which groups are affected?</p> <p>Is there any evidence of higher or lower participation or uptake by different groups?</p> <p>Is there any evidence that different groups have different needs, experiences, issues and priorities?</p>	<p>No – this strategy is written to be inclusive whilst acknowledging that it is specifically aimed at those people with mental health problems and not other groups who experience social exclusion</p> <p>This strategy is intended to address the known and differing needs of different groups</p>	<p>A process for action planning has been agreed and is underway. This includes a range of contributors using an agreed format which includes named individuals who have lead responsibility and timeframes. Monitoring of the actions within the plan should produce evidence of inclusion and may produce evidence of any adverse impact, and / or higher or lower take up.</p> <p>Monitoring of implementation should include an assessment of whether different needs are being met.</p>
<p>What would be the likely impact of the policy?</p>	<p>A reduction in social exclusion of those people with mental health problems</p>	<p>None</p>
<p>Should the policy under review be altered so as to provide an opportunity to promote equality of opportunity or good race relations?</p>	<p>This strategy has now been approved and has been updated as a result of consultation.</p>	<p>None</p>
<p>What consultation is necessary?</p>	<p>Consultation took place with 2gether NHS FT, Gloucestershire PCT, Gloucestershire County Council, District Councils, Learning and Skills Council, Gloucestershire First, Job Centre Plus, and Carers Gloucestershire. In addition a three month public consultation included meetings with the voluntary and community sector, service users and carers, members of the public and parish and town councils</p>	<p>None</p>

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<p>Should the policy be adopted? Keep a record of the conclusions at each stage of the decision-making process, so that they can be brought together in the equality impact assessment report.</p> <p>The report should contain reasons for decisions made and recommendations as to how the policy will be put into practice, including suggestions for training and monitoring</p> <p>The report should also clearly show the relative weight given to each type of evidence:</p> <ul style="list-style-type: none"> ▪ monitoring data ▪ research findings ▪ other statistics ▪ the results of consultations (formal and informal). 	<p>Yes</p>	<p>None</p>
<p>What monitoring arrangements are necessary?</p>		<p>See above</p>
<p>How will the results of consultations and assessments be published? The specific duty to produce and publish a Race Equality Scheme requires that the results of assessments and consultations carried out in respect of any policy is relevant to the race equality duty must be published</p>	<p>The strategy is being launched on the 29th January 2009 and the EIA will be made available.</p> <p>The Equality Impact Assessment will be published on the Trust's intranet and internet.</p>	<p>As stated</p>

Useful contacts and links:

Within Gloucestershire Partnership NHS Trust	Race Equality Steering Group: (Executive Lead – Kay Harrison) Race Awareness Staff Group: contact via Kay Harrison’s office Black Mental Health Team 27 Worcester Street Gloucester GL1 3AJ Tel: 01452-387744
Local organisations	Cheltenham and Tewkesbury PCT: http://www.chelttewkpct.org.uk Cotswold and Vale PCT: http://www.cotsvalepct.org.uk/ Gloucestershire Ambulance Trust: http://www.glosamb.org.uk/ Gloucestershire Hospitals Trust: http://www.gloshospitals.org.uk/ West Gloucestershire PCT: http://www.westglospct.org.uk Gloucestershire County Council: http://www.gloucestershire.gov.uk/ Gloucester City Council: http://www.gloucester.gov.uk Cheltenham Borough Council: www.cheltenham.gov.uk/ Cotswold District Council: www.cotswold.gov.uk/ Forest of Dean District Council: www.fdean.gov.uk/ Stroud District Council: www.stroud.gov.uk/ Tewkesbury Borough Council: www.tewkesburybc.gov.uk/ Gloucestershire Probation Area http://www.glosprobation.org.uk/

Gloucestershire Police <http://www.gloucestershire.police.uk/>

MAIDeN Database: <http://www.gloucestershire.gov.uk/environment/maiden/>

GUIDE Information Services: <http://www.guide-information.org.uk/>

Gloucestershire Race Equality Council <http://freespace.virgin.net/glos.rec/>

Linking Communities: <http://www.linkingcommunities.org.uk/>

Gloucestershire Action for Refugees and Asylum Seekers:
http://members.lycos.co.uk/GARAS/about_garas.htm

Gloucestershire Chinese Women's Guild <http://www.softdata.co.uk/gloucester/china/guild.html>
Gloucestershire Chinese Community Association: Hatherley Road Day Centre Hatherley Road Gloucester
GL1 4PN Tel: 01452-503094

Gloucestershire African and Caribbean Association 213 Barton Street Gloucester GL1 4HY Tel: 01452-387754 email: glosaca_1@hotmail.com

Gloucester Muslim Welfare Association <http://www.gmwa.org.uk/>

Gloucestershire Black Carers Forum 3 Pitt Street, Gloucester, GL1 2BH Tel: 01452 386283

Bangladeshi Gloucestershire Association 6 Goodyere Street, Gloucester, GL1 4UG Tel: 01452 383921

Dawn Africa 68b Ryecroft Street, Gloucester Gloucestershire, GL1 4LY Email: dawnafrika@lycos.co.uk

Hindu Welfare and Cultural Association c/o 57 Bittern Avenue Abbeydale, Gloucester, GL4 4WG
Tel: 01453 755934

Indian Association Hindu Community Centre, 64 Swindon Road, Cheltenham GL51 4AY Tel: 01242 584250

Interfaith Action & Council The Trust Centre, Conduit Street, Gloucester, GL1 4HY Tel: 01452 530337

	Islamic Trust Jama Mosque, All Saints Road, Gloucester GL1 4EE Tel: 01452 302033
Regional organisations	Avon, Gloucestershire and Wiltshire SHA: http://www.agwsha.nhs.uk/ National Institute for Mental Health South West http://www.nimhesw.org.uk/
National organisations	Department of Health http://www.dh.gov.uk/Home/fs/en Commission for Racial Equality: http://www.cre.gov.uk National Institute for Mental Health http://www.nimhe.org.uk Chinese Mental Health Association http://www.cmha.org.uk Muslim Health Network http://www.muslimhealthnetwork.org/ National Statistics Office: http://www.statistics.gov.uk/

Useful publications: (all are accessible via the National Institute for Mental Health website: <http://www.nimhe.org.uk>)

Inside Outside: Improving Mental Health Services for Black and Minority Ethnic Communities in England'

Engaging and Changing: Developing effective policy for the care and treatment of Black and minority ethnic detained patients

Real Voices: Survey Findings from a series of community consultation events involving Black and minority ethnic groups in England

Breaking the Circles of Fear: A review of the relationship between mental health services and African and Caribbean communities

David Bennett Inquiry: Report of the Independent Inquiry

Celebrating our Cultures: Guidelines for Mental Health Promotion with Black and Minority Ethnic Communities

Celebrating our Cultures: South Asian

Celebrating our Cultures: Asylum Seekers and Refugees

Celebrating our Cultures: Chinese

Celebrating our Cultures: African Caribbean

Celebrating our Cultures: Irish

What are the aims of the policy?

What specific responsibilities does the Trust have in relation to the policy being assessed?

Where does responsibility for the proposed policy finally rest?

How will the policy be put into effect and who will be responsible for it?

To what extent might the policy achieve equal opportunities and good relations between different groups?

What specific outcomes could the Trust hope to see from the policy?

What criteria will be used to measure progress towards the outcomes?

Are there any risks associated with the policy, particularly for meeting the equality duty?

How does the policy fit in with other policies?

Is the overall purpose of the policy compatible with the Trust's equality and diversity policy?

Which individuals and organisations are likely to have an interest in the policy?

Do the stakeholders include representatives from all the groups likely to be affected by the policy?

What relationships does the Trust have, or need to have with these stakeholders, if the policy is to be credible and have their support?

Would there be any benefit involving other organisations with similar policies in the assessment process so as to benefit from their experience, and avoid duplicating work they might have already done?

Is there any evidence that some groups could be adversely affected? If there is which groups are affected?

Is there any evidence of higher or lower participation or uptake by different groups?

Is there any evidence that different groups have different needs, experiences, issues and priorities?

What sort of information will the Trust need to develop an effective policy that benefits all groups equally?

What quantitative and qualitative is already available within the Trust, for example historical, demographic and other statistical data including census data.

What equalities monitoring data is available?

Would other organisations with similar policies be able to advise as to the information they found useful?

Would comparisons with similar policies in other public sector organisations particularly but not exclusively organisations in the health community be useful?

Is the available information up to date, relevant and reliable?

Does the available information need to be supplemented through new research, or specially commissioned qualitative or quantitative surveys, or consultation exercises?

Are there any other organisations that might also want to commission new data or research or consultation exercises?

What would be the likely impact of the policy?

Does analysis of the information show that the disparities between groups are statistically significant and not the result of chance?

If so consider whether they could be explained by other factors.

If not, or if equalities plays an important part in the explanation review the policy or the proposed policy and consider other options, including measures to mitigate the adverse impact.

Could the policy lead to unlawful direct discrimination?

If it could it must be abandoned and different ways of achieving the policy's aims must be identified.

Could the proposed policy lead to unlawful indirect discrimination?

If it could then different ways of achieving the policy's aims should be identified.

If the policy's potential for indirectly discriminating against some groups is justifiable, the reasons must have nothing to do with race and legal advice on the question of justifiability should be sought.

Could the policy damage relations between the Trust and particular groups?

Could the policy be in breach of other legislation?

Is the policy intended to increase equality of opportunity for some groups, for example, by taking advantage of the positive action provisions of the Race Relations Amendment Act?

Is the policy lawful, and can it be justified?

Will steps need to be taken to counter any resentment the policy might cause amongst other groups?

Has the policy been re assessed? If it has had substantive changes been made to the original proposal?

Have the results of the assessment been discussed with stakeholders?

Does an informal consultation exercise, internally or externally, need to be held at this stage?

Would further research be useful and would this be a proportionate response to the policy in terms of its importance?

Should the policy under review be altered so as to provide an opportunity to promote equality of opportunity or good race relations?

Does the assessment show that the policy could have an adverse impact on some groups?

If so, the aims and purpose of the policy should be re examined and the approach reconsidered.

Are there aspects to the policy that could be changed, or could additional measures be taken, to reduce or remove adverse impact on a particular group, without affecting the policy's overall aims?

Could this unintentionally result in disadvantaging another group? Would you be able to justify this, on balance?

How does each policy option advance or hinder equality of opportunity?

Could the policy lead to tensions between groups?

If it could, is this because its purpose is to take advantage of provisions in the law that permit discrimination in order to tackle under-representation, or to meet the needs of a particular group?

Are there steps that could be taken to reduce tensions, resentment or misunderstanding, by explaining the aims of the policy and showing that its intention is to tackle inequalities and not create them?

Will the social and economic costs or benefits to the group(s) in question outweigh the costs to the Trust or to other groups?

What are the net social benefits of implementing each option?

What consultation is necessary?

Have all the groups likely to be affected by the proposed policy, whether directly and indirectly been identified?

Which organisations and individuals are likely to have a legitimate interest in the policy?

What methods of consultation are most likely to succeed in attracting the people to be consulted?

Have other departments or authorities held formal consultations on similar policies?

If they have, are the results relevant and are they still up to date?

If they are relevant and up to date consider whether other methods of consultation might get particular sections of the population more involved, for example by holding separate meeting for particular communities, and also for groups within these communities, such as young people, older people, women, people with disabilities, Gypsies and Travellers, and new migrants, including asylum seekers and refugees.

Has the Trust's Race Awareness Staff Group been consulted?

Have external advisory groups such as Gloucestershire Race Equality Council or Linking Communities been asked to carry out consultations in their sectors or areas of expertise?

Is it possible to use the knowledge and experience of 'community representatives' to set up direct consultation exercises with different sections of the communities they represent?

Have previous attempts to consult particular communities been unsuccessful?

If they have, what are the reasons and what can be done to overcome any obstacles?

Are resources available to encourage full participation by groups that have proved hard to reach?

Will proposed consultation events coincide with religious customs or festivals?

How will information, pre- and post-consultation, be made available?

Have arrangements been to translate the consultation material, the publicity material for the consultation, and have interpreters been arranged to attend consultation events?

Should the policy be adopted?

Does the assessment show that the policy will have an adverse impact on a particular group (or groups)?

Is the proposal likely to make it difficult to promote equal opportunities or good relations between different groups?

If the answer to both these questions is 'yes', can the policy be revised, or can additional measures be taken, so that it achieves its aims, but without risking any adverse impact?

What are the main findings of any consultations, and what weight should they carry?

What weight should be given to other evidence?

Who will be involved in the decision-making process?

How will the decision-making process be structured, and how will the decisions be recorded?

Is the policy directly discriminatory in any of the areas covered by the Equalities Legislation (that is, it would lead to people from a particular group(s) being treated less favourably than people from other groups)? If it is it will be unlawful and should be rejected straightaway.

Will the policy indirectly discriminate (that is, it would it disadvantage people from some groups)? If it will it may need to be rejected unless it can be justified.

What monitoring arrangements are necessary?

Should the policy be piloted, to see how it actually affects people, depending on their group?

How will the results of the pilot be taken into account before the policy is finally adopted and launched?

How will the policy be monitored once it becomes operational?

What sort of data will be collected and how often will it be analysed?

Will the monitoring include qualitative methods, such as surveys, or follow-up consultations?

Who will be responsible for the monitoring?

How will the effects of the policy on equality of opportunity and good race relations be monitored?

What criteria will be used to assess these?

How will any concerns be taken into account in any review of the policy?

How often will the policy be reviewed, and who will be responsible for this?

Has a formal monitoring programme been drawn up, to make sure the entire process is followed through systematically, and within a realistic timetable?

How will the results of consultations and assessments be published?

Does the report contain a description and explanation of the proposed policy, putting it in its wider policy and legislative context?

Is there an explanation of how the policy was assessed for its likely effects on different groups with clear references to the information and research used as a benchmark?

Does the report contain description of the consultation methods used, and a summary of the overall findings?

Would brief summary reports on the impact assessments and consultations that have been carried out be appropriate?

Where will the report or the brief summary be published: in the annual report, on the Trust's website or in the Trust's newsletter?

Will the published report be readily available to anyone who wants a copy?

Have arrangements been made for providing translations in languages other than English, including Braille, and specially formatted versions and audio tapes, on request.