



Equality and Fairness Impact Assessment (EFIA) Form and Guidance

If the '*policy or practice*'* you are developing or going to develop is assessed as relevant after undertaking the online screening process (the Integrated Appraisal Toolkit) - that is, it will have an impact on people - you should complete an Equality and Fairness Impact Assessment (EFIA).

This form (which includes accompanying guidance) should be completed.

*see definition below on Page 5

EFIA Form

Complete this for all *relevant policies*
'Relevant' means it will have an impact on people
'Policy or Practice' - see definition below

Definition of policy or practice for the purposes of EFIA:
For the purposes of an EFIA the term 'policy or practice' covers Service delivery and Employment. This can include a Policy, a Plan, a Strategy, a Project, a Service Review, a function, practice or service activity or a Budget option.

Section 1: Policy Details (see definition of 'Policy' or 'Practice' above)

Name of Policy or Practice:

Covid-19 Risk Assessments

- [General Risk Assessment Form](#)
- [Checklist and Risk Assessment for Pregnant Workers](#)
- [Underlying Health Conditions, BAME, Pregnant Worker Risk Assessment](#)

Service and Division/Team:

Education & Children's Services

Owner/Person Responsible (include your Name and Position):

Lorna Hamilton, Project Manager – Response and Recovery (Temp)

Impact Assessment Team (include your Names and Positions). This team can consist of two people or more as appropriate:

Lorna Hamilton, Project Manager – Response and Recovery (Temp)
Kwanele Matiwaza, Health & Safety Adviser, for all risk assessments
Corporate Health & Safety Team
Corporate Human Resources

Is the *'policy' or 'practice'* being impact assessed new or existing? Please tick the appropriate box below to indicate.

New

Existing

What are the main aims of the policy or practice?

To identify and manage risks to Council employees and school pupils in relation to COVID-19.

Who are the main target groups/beneficiaries?

- PKC employees;
- School pupils;
- PKC employees and school pupils with underlying health conditions and other at-risk groups (i.e. people with an underlying health condition, Black Asian and Minority Ethnic (BAME) and Pregnant Workers).

What are the intended outcomes of the policy or practice?

- To enable risk assessors to identify the specific risks and control measures needed in relation to COVID-19 in the workplace.
- To reduce the risk of transmission of COVID-19 in and around the workplace.
- To keep staff, pupils and members of the public safe from COVID-19.

Section 2: Information Gathering

You should list here the sources of information used to assess the impact of the relevant policy or practice. This can include local sources such as reports, information and data, relevant partners' information, data and reports, other Council's relevant information, data and reports, national information, research outcomes, data profiles and any other evidence which has led to the development of this policy. You may wish to refer to Appendix 1 for reference when gathering information relating to Equality Monitoring Data,

Information/Evidence Gained and Used to Shape this Policy or Practice	List Details, Source and Date <i>(continue on a separate sheet if necessary – tick to indicate this has been done)</i> <input checked="" type="checkbox"/>
Community consultation/involvement outcomes from earlier contacts - this usually includes formally arranged contact with individuals or community, voluntary sector and other relevant interest groups	<ul style="list-style-type: none"> • Policy relates to employees and pupils rather than external community.
Employee involvement/consultation feedback (e.g. survey, focus groups)	<ul style="list-style-type: none"> • Discussions with school staff via Primary Heads of Establishment Group (PHEG) & Secondary Heads of Establishment Group (SHEG) meetings.
Research and information list main sources	<ul style="list-style-type: none"> • Educational Institute of Scotland (EIS) Coronavirus Guidance • COVID-19: Understanding the Impact on BAME Communities • Guidance on the meaning of shielding • Public Health Scotland Guidance • NHS Inform - Coronavirus (COVID-19) Guidance
Officer knowledge and experience	<ul style="list-style-type: none"> • Project lead has extensive experience of supporting the Council's COVID-19 response for ECS since March 2020; • Member of Corporate Health & Safety Team reviewing risk assessments & supporting staff who are completing them; • Wider Corporate Health & Safety Team involved in developing templates; • Input from Corporate Human Resources re. Equalities & Fairness; and • Input from Corporate Equalities.
Equality monitoring data	<ul style="list-style-type: none"> • Via Corporate Human Resources.

<p>Service user feedback (including customer contact, services and complaints)</p>	<ul style="list-style-type: none"> • Feedback from Heads of Establishment & Business Managers via regular PHEG & SHEG meetings. • Feedback from individual members of staff received via generic account • Service users are involved in developing Risk Assessments for individuals.
<p>Partner feedback</p>	<ul style="list-style-type: none"> • Trade Unions and professional associations • LNCT feedback at school level • Care Inspectorate • NHS • Risk Assessments for individual pupils are developed in liaison with Pupil/Parent/Carer/GP/Social Work as appropriate.
<p>Other - this may be information gathered in another Council area, nationally or in partner organisations which is considered to have relevance</p>	<ul style="list-style-type: none"> • Benchmarking and information sharing with TRIC partners; and • Corporate Health & Safety liaison with other authorities for benchmarking and information sharing.

Section 3: Consultation/Involvement

Consultation with key stakeholders can be undertaken throughout the whole of the equality and fairness impact assessment process. This section can include details of outcomes from current, earlier or ongoing consultation/involvement activities. This activity **can also** help to **reach people not previously involved** with these processes, but who will be affected by this policy or practice when it is implemented.

The Consultation/Involvement process can also help **identify or agree changes** that need to be made to ensure the policy or practice will be inclusive when implemented.

The Equalities Team Leader (equalities@pkc.gov.uk) may be able to provide advice relating to potential contact with consultees from equality protected characteristic groups via existing mechanisms such as the Community Equalities Advisory Group (CEAG) or Equalities Strategic Forum.

A summary of the replies received from individuals and stakeholders consulted/involved. Include any previous feedback or complaints relating to equality and diversity issues and the policy or practice currently being assessed.

Equality Protected Characteristic	Specific Characteristics	Date	Outcome of Consultation/Involvement <i>(continue on a separate sheet if necessary – tick to indicate this has been done</i> <input type="checkbox"/>
Age	Older People (65+)		N/A
	Younger People (16-64)		N/A
	Children (0-16)		N/A
	Looked After Children (Corporate Parenting)		N/A
Disability	Physical Disability		All of these would be involved in completing their individual risk assessment
	Sensory Impairment		As above
	Mental Health		As above
	Learning Disability		As above
Gender Reassignment	Male transitioning to female		N/A

	Female transitioning to male		N/A
Marriage/Civil Partnership	Women		N/A
	Men		N/A
	Same Sex Couple (Male)		N/A
	Same Sex Couple (Female)		N/A
Pregnancy / Maternity/Paternity	Women		Would be involved in completing their individual risk assessment
	Men (Paternity)		N/A
Race	A list of categories used in the census is here		Would be involved in completing their individual risk assessment
Religion / Belief	A list of categories used in the census is here		N/A
Sex	Female		N/A
	Male		N/A
	Other Gender Identity		N/A
Sexual Orientation	Lesbian		N/A
	Gay		N/A
	Bisexual		N/A
Socio-economic(fairness)	Options detailed in Appendix 2		N/A

Section 4: Detail the Positive and/or Negative Impacts or Tick to Indicate No Impact

Key Questions to Address

The Assessment should highlight areas of interest covering the following:

- > Positive and Negative impacts across all protected characteristics.
- > Scale of the Impact: An indication of the degree of potential impact, and whether this is judged to have a High, Medium or Low impact potential.
- > Anticipated duration of the impact if relevant
- > Whether there is a specific differential impact to a particular protected characteristic or characteristics
- > Or if the impact is more wide ranging and general in its effect.
- > Whether any impacts identified would/could be mitigated by an amendment to the policy, practice budget decision or service reform proposal

This information will be indicated by activities at Section 2 and Section 3 above.

Equality Protected Characteristic	Specific Characteristics	Positive Impact (it could benefit the group concerned)	Negative Impact (it could disadvantage the group concerned)	No Impact
Age	Older People (65+)	Individual Risk Assessment		
	Younger People (16-64)	Individual Risk Assessment		
	Children (0-16)	General Risk Assessment		
	Looked After Children (Corporate Parenting)			N/A
Disability	Physical Disability	Individual Risk Assessment		
	Sensory Impairment	Individual Risk Assessment		
	Mental Health	Individual Risk Assessment		
	Learning Disability	Individual Risk Assessment		
Gender Reassignment	Male transitioning to female			N/A
	Female transitioning to male			N/A

Marriage/Civil Partnership	Women			N/A
	Men			N/A
	Same Sex Couple (Male)			N/A
	Same Sex Couple (Female)			N/A
Pregnancy / Maternity/Paternity	Women	Individual Risk Assessment		
	Men (Paternity)			N/A
Race	A list of categories used in the census is here	Individual Risk Assessment		
Religion / Belief	A list of categories used in the census is here			N/A
Sex	Female			N/A
	Male			N/A
	Other Gender Identity			N/A
Sexual Orientation	Lesbian			N/A
	Gay			N/A
	Bisexual			N/A
Socio-economic (fairness)	Options detailed in Appendix 2			N/A

Section 5: Recommendations and Actions

As a result of this equality impact assessment, please **clearly describe practical actions** you plan to take to:

- reduce or remove any identified **negative impact**
- promote any **positive impact** or
- gather** further information/evidence

Equality Protected Characteristic	Specific Characteristics	Action	Who is responsible	Date for completion
Age	Older People (65+)	Ensure individual risk assessment is carried out	HT	Before employee is in school
	Younger People (16-64)			
	Children (0-16)	Ensure general Risk Assessment carried out by schools		Before schools return to in school learning
	Looked After Children (Corporate Parenting)			
Disability	Physical Disability	Ensure individual risk assessment is carried out	HT	Before employee/pupil is in school
	Sensory Impairment	Ensure individual risk assessment is carried out	HT	Before employee/pupil is in school
	Mental Health	Ensure individual risk assessment is carried out	HT	Before employee/pupil is in school
	Learning Disability	Ensure individual risk assessment is carried out	HT	Before employee/pupil is in school
Gender Reassignment	Male transitioning to female			
	Female transitioning to male			
Marriage/Civil Partnership	Women			

	Men			
	Same Sex Couple (Male)			
	Same Sex Couple (Female)			
Pregnancy / Maternity/Paternity	Women	Ensure individual risk assessment is carried out	HT	Before employee is in school
	Men (Paternity)			
Race	A list of categories used in the census is here	Ensure individual risk assessment is carried out	HT	Before employee/pupil is in school
Religion / Belief	A list of categories used in the census is here			
Sex	Female			
	Male			
	Other Gender Identity			
Sexual Orientation	Lesbian			
	Gay			
	Bisexual			
Socio-economic (fairness)	As detailed in Appendix 2			

Section 10: Review and Monitor

Note of Action required (from Section 5)

Date completed

Note of Action required (from Section 5)

Date completed

Note of Action required (from Section 5)

Date completed

Note of Action required (from Section 5)

Date completed

Add more sections as required

The Equality Protected Characteristics in Our Area

There are nine protected characteristics in the Equality Act and these are disability, sex, race, sexual orientation, gender reassignment, age, marriage and civil partnership, pregnancy and maternity and religion and belief.

The [Scottish Government Equality Evidence Finder](#) is updated twice a year with data surrounding equality evidence from a wide range of policy areas. Some key local statistics should be noted:

Disability - 28% of the Perth & Kinross population consider themselves to have a long term physical or mental health condition, compared to 22% for Scotland overall. (*Scottish Household Survey 2016*)

Sex - 49% of the Perth & Kinross population identify as male, the same as Scotland overall. (*Scottish Household Survey 2016*)

Race - 98% of the Perth & Kinross adult population classify themselves as 'White', compared to 96% for Scotland as a whole (*Scottish Household Survey 2016*)

Sexual orientation - 99% of the Perth & Kinross adult population identify as Heterosexual, compared to 98% for Scotland overall. (*Scottish Household Survey 2016*)

Gender reassignment - The Registrar General for Scotland maintains a Gender Recognition Register in which the birth of a transgender person whose acquired gender has been legally recognised is registered showing any new name(s) and the acquired gender. This enables the transgender person to apply to the Registrar General for Scotland for a new birth certificate showing the new name(s) and the acquired gender. The Gender Recognition Register is not open to public scrutiny. Local information is not available. (*NRS Registration Division 2016*)

Age - Young people under 16 currently make up 16% of the population in Perth & Kinross, compared to the national average of 17%. People aged 65 and over account for 23% of the total population, higher than the national average of 19%. By 2039 this proportion is set to increase to 30%. (*ONS Population data*)

Marriage and civil partnership - 58% of the Perth & Kinross adult population are married or in a civil partnership, compared to 47% for Scotland as a whole. (*Scottish Household Survey 2016*)

Pregnancy and maternity - In 2016, the birth rate was 53.5 per 1000 women aged 15-44. In other words, broadly 5.4% of women of child bearing age were pregnant in 2016 in Perth and Kinross, compared to 5.2% for Scotland as a whole. (*NRS Vital events 2016*)

Religion and belief - 52% of the Perth & Kinross adult population consider themselves to have a religious belief, compared to 49% for Scotland as a whole. (*Scottish Household Survey 2016*)

National data sources have been used to provide this information but it should be noted that the Scottish Household Survey is only based on a sample of respondents so variations may not be statistically significant.

Appendix 2– Socio-economic (Fairness)

Socio-Economic Disadvantage:

- Low Income – (in comparison to most others) – can be measured in a range of ways e.g. relative poverty (after housing costs) looks at number of individuals living in households with incomes below 60% of UK median income. Statistics on absolute poverty (household living standards over time) and persistent poverty (where households live in poverty for 3 years out of 4) are also available. Poverty statistics can also be broken down by gender, disability, ethnicity, tenure and urban/rural.
- Low/No Wealth – having access to wealth e.g. financial products, equity from housing and a pension, provides some protection from socio-economic disadvantage. Single adult households (including single parent households) have very high risks of low wealth; households with lower educational qualifications and in routine or manual occupations have significantly higher risks of low wealth.
- Material deprivation – refers to households being unable to access basic goods and services and tends to focus on families with children.
- Area deprivation - living in a deprived area can exacerbate negative outcomes for individuals and households already affected by issues of low income.
- Socio-economic background – the structural disadvantage that can arise from parents' education, employment and income (i.e. social class) is more difficult to measure.

Inequalities of Outcome – any measurable differences for communities of interest or communities of place such as:

- Poorer skills and attainment
- Lower quality, less secure and lower paid work
- Greater chance of being a victim of crime
- Lower healthy life expectancy
- Less chance of a dignified and respectful life

Communities of Place – refers to people who are bound together because of where they reside, work, visit or otherwise spend a continuous proportion of their time. Poverty is often hidden in smaller rural communities with issues such as cost of living and accessibility of transport, education and employment impacting more negatively.

Communities of Interest – refers to people who share an identity e.g. an equality protected characteristic. Consideration of the impact on those groups can help develop a deeper understanding of socio-economic impact, particularly by talking to people with lived experiences.

For further information refer to [Fairer Scotland Duty -Interim Guidance for Public Bodies](#)

Appendix 3– Human Rights Based Approach

A Human Rights approach should also be an embedded consideration in an EFIA.

In summary; we need to consider, where applicable, to what (if any) extent policies, practices, projects, Service Reforms, or Budget Options impact on three key strands of Human Rights:

Absolute rights:

- > the right to life,
- > the right to freedom from inhuman and degrading treatment

Limited rights:

- > the right to liberty,
- > the right to a fair trial

Qualified rights

- > the right to respect for private and family life, home and correspondence
- > the right to freedom of thought, conscience and religion
- > the right to freedom of assembly and association
- > the right to protection of property

Any restriction of Qualified Rights must be:

- > In accordance with the law: have a basis in domestic law, safeguards against arbitrary interference, foreseeable
- > In pursuit of a legitimate aim: including "the economic wellbeing of the country"; "the protection of health", "protection of the rights and freedoms of others"
- > Necessary
- > Proportionate
- > Not discriminatory

There is further guidance on integrating human rights into the equality impact assessment process available on the Scottish Human Rights Commission website following previous pilots with local authorities: <http://eqhria.scottishhumanrights.com/>