



# **Integrated Impact Assessment Toolkit**

**Corporate Services  
Revised March 2018**

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## **Section 1 What is Integrated Impact Assessment**

### **1.1.1 Introduction**

West Lothian Council provides services to a diverse community and the decisions made by the council can have a profound influence on the health and wellbeing of that community.

Integrated Impact Assessment (IIA) aims to enable the council to meet its legal duties to consider equality, human rights and health when considering changes to 'policy' or services or implementing new policies or services. It also provides an opportunity to identify and tackle any unanticipated impacts on the wider causes of poor outcomes in our communities, such as inadequate housing, low educational achievement, low income, reliable and accessible transport, poverty, stigma and social inequality. This process will also allow the council to critically assess whether a 'Policy' has wider impacts beyond its intended outcomes and if it impacts differentially on different groups in our communities.

For the purposes of this toolkit the term IIA refers to both Integrated Relevance Assessment (IRA) (the screening aspect) and the full Integrated Impact Assessment unless otherwise stated.

## **1.2 Legal Context**

### **1.2.1 Public Sector Equality Duty (PSED)**

Section 149 of The Equality Act 2010 came into force in April 2011, introducing a new Public Sector Equality duty. The Public Sector Equality Duty (PSED) (often referred to as the 'general duty') requires public bodies in the exercise of their functions, to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct
2. Advance equality of opportunity between those who share a protected characteristic and those who do not; and
3. Foster good relations between those who share a protected characteristic and those who do not

Supplementary legislation was introduced by the Scottish Government in 2012 (the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012). This legislation was introduced with the express purpose of enabling the better performance of the PSED contained in s149 (1) of the Equality Act 2010. This supplementary legislation requires Local Authorities to be proactive in meeting the general duty of eliminating unlawful discrimination, advancing equality and fostering good relations.

### **1.2.2 Protected Characteristics**

The legislation requires that people are not discriminated against, harassed or victimised on the grounds of their 'Protected Characteristic'. The Protected Characteristics are;

- age,
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,
- race – this includes ethnic or national origin, nationality and also includes Gypsy/Travellers,
- religion or belief (including lack of belief),
- sex,
- sexual orientation.

Every person has one or more of the protected characteristics; therefore the Act protects all individuals against unfair treatment.

Undertaking an IIA is one way to ensure council policies meet these legal requirements.

Assessing the likely impact of our plans and services also makes good business sense, as it is important in developing any proposal to understand the needs of different population groups.

One of the main aims of the PSED is to improve transparency and accountability and this is also a priority for the Council when it comes to reporting on potential 'policy' changes and other equality related issues.

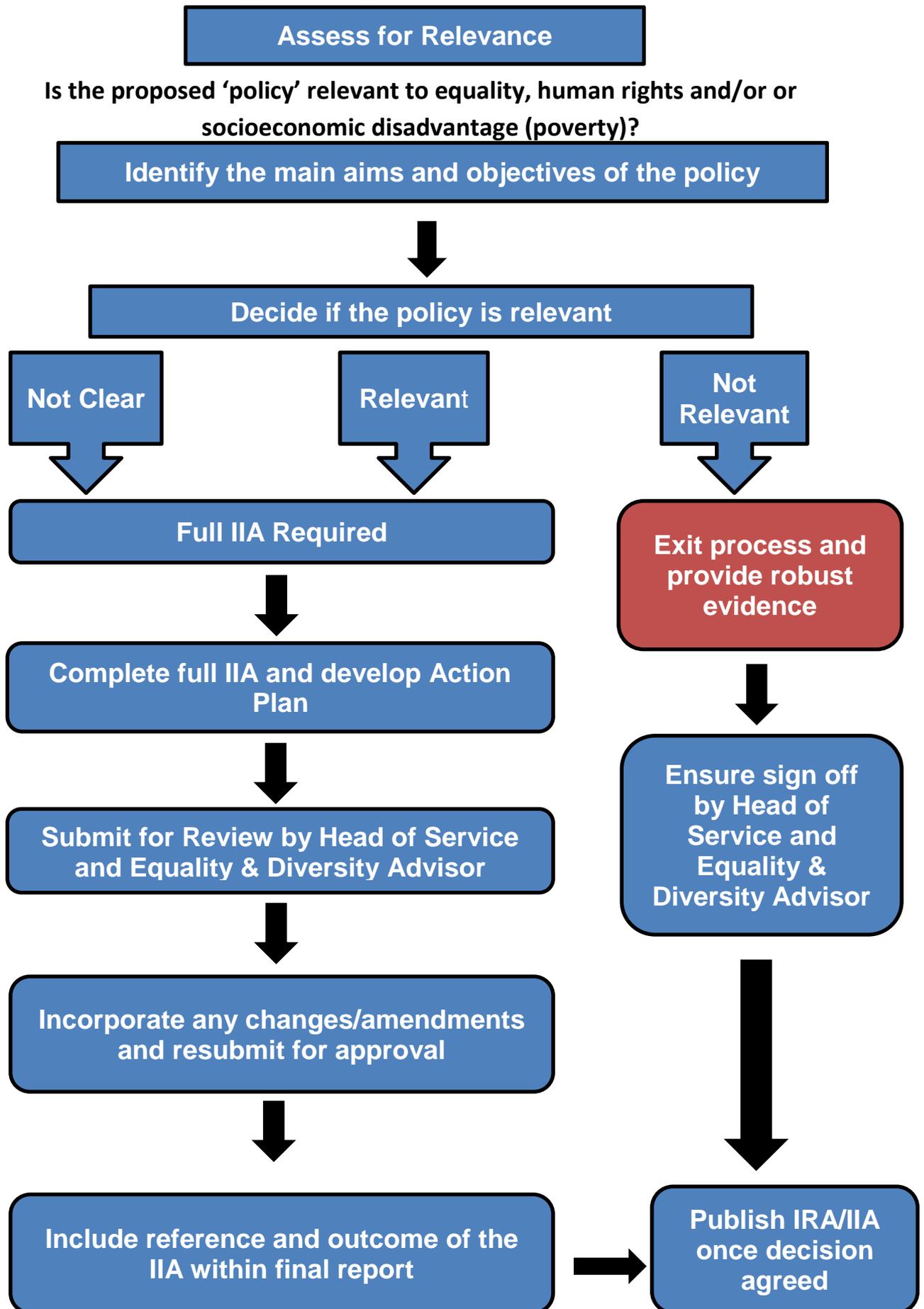
### **1.3 Definition of Policy**

The term 'policy' is used throughout this toolkit and the guidance notes (separate document) and applies to policies, strategies, provisions, criteria, functions, practices, budget savings and activities, including the delivery of services.

Everything we do as a council has the potential to impact on equality, human rights and socioeconomic disadvantage and have relevance to the Public Sector Equality Duty (PSED) in the Equality Act (2010) and the corresponding supplementary 'Specific Duties' contained within the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012, Fairer Scotland Duty (part 1 of the Equality Act 2010), Human Rights Act 1998 and the Child Poverty (Scotland) Act 2017, therefore Integrated Impact Assessment (IIA) should not be restricted to a review of formal 'policy' documents or written action plans.

1.4

### Integrated Impact Assessment Flowchart





## Integrated Relevance Assessment Form

1. Details of proposal	
<b>Policy Title</b> (include budget reference number if applicable)	Buy Extra Nursery Hours
<b>Service Area</b> (detail which service area and section this relates to)	Education Services
<b>Lead Officer</b> (Name and job title)	Greg Welsh, Head of Education
<b>Other Officers/Partners involved</b> (list names, job titles and organisations if applicable)	Education Customer Support Team, Digital Transformation Team, Digital Learning Team
<b>Date relevance assessed</b>	08/09/2022
2. Does the council have control over how this policy will be implemented?	
<b>YES</b>	<input checked="" type="checkbox"/> <b>NO</b> <input type="checkbox"/>
3. The General Duty of the Equality Act 2010 requires public authorities, in the exercise of their functions, to have due regard to the need to:	
<ul style="list-style-type: none"> <li>• Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct</li> <li>• Advance equality of opportunity between those who share a protected characteristic and those who do not; and</li> <li>• Foster good relations between those who share a protected characteristic and those who do not</li> </ul> <p><b>NB: In this section you must also consider the Human Rights Act and the key PANEL (Participation, Accountability, Non-Discrimination, Empowerment and Legality) principles of Human Rights – (further detail on what these are, are provided in the guidance document)</b></p>	
Which groups of people do you think will be, or potentially could be, impacted upon by the implementation of this policy? You should consider employees, clients, customers and service users (Please tick below as appropriate)	
<b>Age</b> - Older people, young people and children	Click here to enter text.
<b>Disability</b> - people with disabilities/long standing conditions	Click here to enter text.
<b>Gender reassignment - Trans/Transgender Identity</b> – anybody who's gender identity or gender expression is different to the sex assigned to them at birth	Click here to enter text.
<b>Marriage or Civil Partnership</b> – people who are married or in a civil partnership	Click here to enter text.

<b>Pregnancy and Maternity</b> – woman who are pregnant and/or on maternity leave	Click here to enter text.
<b>Race</b> - people from black, Asian and minority ethnic communities and different racial backgrounds	Click here to enter text.
<b>Religion or Belief</b> – people with different religions and beliefs including those with no beliefs	Click here to enter text.
<b>Sex</b> - female, male and intersex	Click here to enter text.
<b>Sexual Orientation</b> – lesbian, gay, bisexual, heterosexual/straight	Click here to enter text.
<b>4. Do you have evidence or reason to believe that this policy will or may impact on socio-economic inequalities? Consideration must be given particularly to children and families</b>	
<b>Socio-economic Disadvantage</b>	<b>Impact – please tick below as appropriate)</b>
<b>Low Income/Income Poverty</b> – cannot afford to maintain regular payments such as bills, food, clothing	X Discounts will not be available as we do not wish to undercut private sector, could mean it is not affordable for people on low incomes.
<b>Low and/or no wealth</b> – enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future	X Discounts will not be available as we do not wish to undercut private sector, could mean it is not affordable for people on low incomes.
<b>Material Deprivation</b> – being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies	Click here to enter text.
<b>Area Deprivation</b> – where you live (rural areas), where you work (accessibility of transport)	X The service will not be available in every nursery as priority must be given to statutory placements.
<b>Socioeconomic Background</b> – social class i.e. parents education, employment and income	Click here to enter text.
<b>5. Integrated impact assessment required?</b> (Two <b>ticks (✓)</b> above = full assessment necessary)	
<b>YES</b>	<input checked="" type="checkbox"/>
<b>NO</b>	<input type="checkbox"/>
<b>6. Decision rationale – if you have ticked no above, use this section to evidence why a full IIA is not required</b>	

<b>Signed by Lead Officer</b>	
<b>Designation</b>	Click here to enter text.
<b>Date</b>	Click here to enter a date.
<b>Counter Signature</b> (Head of Service or Depute Chief Executive responsible for the policy)	Click here to enter text.
<b>Date</b>	Click here to enter a date.

- **No assessment required – process ends**
- **Include** a detailed summary of the decision rationale in any council reports and include a copy of the IRA with the background papers.
- **Full Assessment required – continue to Full Assessment Form**

## Full Integrated Impact Assessment Form

1. Details of proposal	
Details of others involved	Andrew Sneddon, Donna Adam, Gosia Kolomanska, Kiam McKay, Susan Harrison, Jennifer Boden, Pamela Roccio
Date assessment conducted	29/09/2022
2. Set out a clear understanding of the purpose of the policy being developed or reviewed (what are the aims, objectives and intended outcomes) including the context within which it will operate.	
<p>This new service aims to allow parent/carers to buy extra nursery hours over and above their child's statutory entitlement. We can offer this in council run nurseries where we have excess capacity that is not needed for statutory placements.</p> <p>We have set the prices to reflect the average charge made by local private childcare providers. This is in line with statutory guidance which states:</p> <p>"89. Education authorities are also, under section 33(2) of the 2000 Act, empowered to charge fees for such discretionary early learning and childcare. The provision of discretionary early learning and childcare, through fees subsidised or otherwise, can provide additional flexibility. Any education authority fees for parents for discretionary early learning and childcare should be transparent."</p> <p>"90. Where education authorities charge for discretionary early learning and childcare, as part of their overall approach to setting charges for discretionary services, it is expected that they give appropriate consideration to the potential impacts on the competitiveness and business sustainability of other providers offering the funded early learning and childcare entitlement."</p>	

<b>3. Please outline any needs and/or barriers which equality groups (People with Protected Characteristics) may have in relation to this policy</b>	
<b>Age</b>	<b>What effect/difference will the policy have on people</b> The application form is online. Older parents/carers may be less able to access online services.
	<b>How do you know that</b> Wide range of evidence to support fact that some people over 60 find it difficult to access online services. For more info see <a href="https://www.gov.scot/publications/connecting-scotland-phase-1-evaluation/pages/4/">https://www.gov.scot/publications/connecting-scotland-phase-1-evaluation/pages/4/</a>
<b>Disability</b>	<b>What effect/difference will the policy have on people</b> The application form is online. Some people with disabilities have difficulty using online services.
	<b>How do you know that</b> Wide range of evidence to support fact that some people with disabilities find it difficult to access online services. For more info see <a href="https://www.gov.scot/publications/connecting-scotland-phase-1-evaluation/pages/4/">https://www.gov.scot/publications/connecting-scotland-phase-1-evaluation/pages/4/</a>
<b>Gender Reassignment – Trans/Transgender Identity</b>	<b>What effect/difference will the policy have on people</b> None
	<b>How do you know that</b> The service is available to all parents/carers of children who receive their statutory ELC entitlement irrespective of gender.
<b>Marriage or Civil Partnership</b>	<b>What effect/difference will the policy have on people</b> None
	<b>How do you know that</b> The service is available to all parents/carers of children who receive their statutory ELC entitlement irrespective of marital status/civil partnership.

<b>Pregnancy and Maternity</b>	<b>What effect/difference will the policy have on people</b> None
	<b>How do you know that</b> The service is available to all parents/carers of children who receive their statutory ELC entitlement irrespective of pregnancy and maternity.
<b>Race</b>	<b>What effect/difference will the policy have on people</b> If parents/carers do not read and write English fluently they may find it more difficult to apply.
	<b>How do you know that</b> Our invitation e-mails and text messages are in English, promotional posters will also be in English. See mitigating factors below.
<b>Religion or Belief</b>	<b>What effect/difference will the policy have on people</b> None
	<b>How do you know that</b> The service is available to all parents/carers of children who receive their statutory ELC entitlement irrespective of religion.
<b>Sex</b>	<b>What effect/difference will the policy have on people</b> None
	<b>How do you know that</b> The service is available to all parents/carers of children who receive their statutory ELC entitlement irrespective of their sex.

<b>Sexual Orientation</b>	<b>What effect/difference will the policy have on people</b> <b>None</b>
	<b>How do you know that</b> <b>The service is available to all parents/carers of children who receive their statutory ELC entitlement irrespective of their sexual orientation.</b>
<b>4. Please outline any needs and/or barriers which may affect vulnerable groups falling into poverty and disadvantage in relation to this policy</b>  <b>Vulnerable groups may include the following;</b>	
<ul style="list-style-type: none"> <li>• Unemployed</li> <li>• Single parents and vulnerable families</li> <li>• People on benefits</li> <li>• Those involved in the criminal justice system</li> <li>• People in the most deprived communities (bottom 20 SIMD areas)</li> <li>• People who live in rural areas</li> </ul>	<ul style="list-style-type: none"> <li>• pensioners</li> <li>• Looked After Children</li> <li>• Carers including young carers</li> <li>• People misusing services</li> <li>• Others e.g. veterans, students</li> <li>• Single adult households</li> <li>• People who have experienced the asylum system</li> <li>• Those leaving the care setting including children and young people and those with illness</li> <li>• Homeless people</li> <li>• People with low literacy/numeracy</li> <li>• People with lower educational qualifications</li> <li>• People in low paid work</li> <li>• People with one or more Protected Characteristic</li> </ul>
<b>What effect/difference will the policy have on people</b> <b>Parents/carers who are unemployed, on benefits or who are on low incomes may find the service too expensive to access.</b> <b>The service will only be offered in nurseries where we have excess capacity. This means that we will not offer the service in every locality and in some areas there may be a lack of alternative childcare facilities. The council has no statutory duty to provide the service or childcare services other than the statutory entitlement for ELC.</b>	

<p><b>How do you know that</b>  <b>Wide range of evidence to show that families struggle with childcare costs see</b>  <a href="https://cpag.org.uk/news-blogs/news-listings/vision-childcare-helps-end-child-poverty-scotland">https://cpag.org.uk/news-blogs/news-listings/vision-childcare-helps-end-child-poverty-scotland</a>  <b>This is why there are a number of Government schemes in place to try to mitigate the costs.</b>  <b>(please see mitigating actions below).</b></p>	
<b>5. Action Plan</b>	
<b>What action/s will be taken, by whom and what is the timescale for completion</b>	
<b>Actioner Name</b>	<b>Action Date</b>
<b>What is the issue</b>	
<b>What action will be taken</b>	
<b>Progress against action</b> Click here to enter text.	
<b>Action completed</b> Click here to enter text.	<b>Date completed</b> Click here to enter a date.
<b>Actioner Name</b> Click here to enter text.	<b>Action Date</b> Click here to enter a date.
<b>What is the issue</b> Click here to enter text.	
<b>What action will be taken</b> Click here to enter text.	
<b>Progress against action</b> Click here to enter text.	

<b>Action completed</b> Click here to enter text.	<b>Date completed</b> Click here to enter a date.
<b>Actioner Name</b> Click here to enter text.	<b>Action Date</b> Click here to enter a date.
<b>What is the issue</b> Click here to enter text.	
<b>What action will be taken</b> Click here to enter text.	
<b>Progress against action</b> Click here to enter text.	
<b>Action completed</b> Click here to enter text.	<b>Date completed</b> Click here to enter a date.
<b>Actioner Name</b> Click here to enter text.	<b>Action Date</b> Click here to enter a date.
<b>What is the issue</b> Click here to enter text.	
<b>What action will be taken</b> Click here to enter text.	
<b>Progress against action</b> Click here to enter text.	
<b>Action completed</b> Click here to enter text.	<b>Date completed</b> Click here to enter a date.
<b>Actioner Name</b> Click here to enter text.	<b>Action Date</b> Click here to enter a date.
<b>What is the issue</b> Click here to enter text.	
<b>What action will be taken</b> Click here to enter text.	
<b>Progress against action</b> Click here to enter text.	

<b>Action completed</b> Click here to enter text.	<b>Date completed</b> Click here to enter a date.
<b>Actioner Name</b> Click here to enter text.	<b>Action Date</b> Click here to enter a date.
<b>What is the issue</b> Click here to enter text.	
<b>What action will be taken</b> Click here to enter text.	
<b>Progress against action</b> Click here to enter text.	
<b>Action completed</b> Click here to enter text.	<b>Date completed</b> Click here to enter a date.

#### 6. Details of consultation and involvement

##### Who will be or has been involved in the consultation process

- a. State which groups are involved in this process and describe their involvement.
- b. Describe any planned involvement saying when this will take place and who is responsible for managing the involvement process.
- c. Describe the results of the involvement and how you have taken this into account.

Parents and carers were surveyed to ask if they would be interested in buying extra nursery hours.

Private partner nurseries in West Lothian were asked for their fees so that ours could be set in line with the average fee.

Click here to enter text.

**7. Data and Information**

**What equality data, poverty data, research, information or other evidence has been used to inform this assessment?**

**(Information can include, for example, surveys, databases, focus groups, in-depth interviews, pilot projects, reviews of complaints made, user feedback, academic publications and consultants' reports)**

- a. What information or other evidence has been used in the development of the policy?**
- b. What does research, consultation and other data or information tell you about the impact of the policy? (Describe the information and the conclusions, and state where the information can be found).**
  - (i) Quantitative (numbers, percentages, statistical data)**
  - (ii) Qualitative – (written/spoken words, opinions, surveys)**
- c. Describe any gaps in the available information, and record within section five (Action Plan Section), action you are taking in relation to this (e.g. new research, further analysis) and when this is planned.**
- d. Give details of any existing local or national evidence which has been used to inform the development of your policy.**

A pilot is underway. We are currently testing the new service with customers in 8 pilot nurseries and taking any feedback from parents/carers and staff. No feedback has been received so far that would change the IIA.

Links have been provided to examples of current research above.

Click here to enter text.

## 8. Mitigating Actions

If the policy has a negative/adverse impact on a particular group/s, but is still to be implemented, please provide justification for this.

**Note:** If the policy is unlawfully discriminatory under the Equality Act 2010 and/or is having a negative impact on poverty and socioeconomic disadvantage under the Fairer Scotland Duty, you **MUST** identify, how the policy can be amended or justified so the Council acts lawfully.

- a. How could you modify the policy to eliminate discrimination or to reduce any identified negative impacts? If necessary, consider other ways in which you could meet the aims and objectives.
- b. How could you modify the policy to create or maximise the positive aspects of the proposals and to increase equality and reduce poverty and socioeconomic disadvantage.
- c. Describe any modifications which you can make without further delay (for example, easy, few resource implications).
- d. If you propose to make any of the modifications shown above, describe any potential new negative impacts on other groups in society or on the ability to achieve the aims and how you will minimise these.
- e. Please describe the resource implications of any proposed modifications taking into account financial, people and property issues.

There are no steps that we can take to change the cost of the service without undercutting the private sector. We have taken account of the statutory guidance in giving due consideration to the local childcare sector when setting our charges. We can signpost customers to the Advice Shop, we can refer to the Government help with childcare costs [https://costofliving.campaign.gov.scot/early-years-and-childcare?qclid=Ci0KCCQjw48OaBhDWARIsAMd966B9j-8f7NnGFntVC0jOfwDUHHrLN3ZbvJRYCZ9KAUFwAdsrelZxvzwaAjk\\_EALw\\_wcB](https://costofliving.campaign.gov.scot/early-years-and-childcare?qclid=Ci0KCCQjw48OaBhDWARIsAMd966B9j-8f7NnGFntVC0jOfwDUHHrLN3ZbvJRYCZ9KAUFwAdsrelZxvzwaAjk_EALw_wcB)

We accept childcare vouchers and tax-free childcare account payments (both government tax free childcare schemes). We have received enquiries from students at West Lothian College and made arrangements for the college to pay a portion of the fees to us directly.

**Our current application process is in Microsoft 365 which has some functionality to translate into different languages and formats. This may be helpful for parents/ carers with disabilities or where English is a second language.**

**Staff are available within nurseries to help parents/carers with form filling if required.**

**We are working to develop a new ELC admissions system which will manage all aspects of ELC placements including buying extra nursery hours. We will work with the supplier and with parents and stakeholders to ensure that accessibility requirements are fully considered in the design and rollout of the new system. We do not anticipate that the new system will result in significant changes to the ELC service or the policies however.**

Click here to enter text.

Click here to enter text.

Click here to enter text.

**9. Monitoring and Review**

- a. **How will the implementation and impact of the policy be monitored, including implementation of any amendments? For example, what type of monitoring will there be? How frequent?**
- b. **What are the practical arrangements for monitoring? For example, who will put this in place? When will it start?**
- c. **How will results of monitoring be used to develop future policies?**
- d. **When is the policy due to be reviewed?**
- e. **Who is responsible for ensuring this happens?**

**Please detail below**

The pilot will continue throughout session 2022/23 and any feedback that is received about the accessibility of the service will be reviewed. The development and rollout of the service is being managed as an Agile project with frequent review points.

Reports will be submitted through the Council’s democratic process to Education PDSP and Executive to provide updates.

Click here to enter text.

Click here to enter text.

<b>10. Recommendation and Reasoning</b>	
<input type="checkbox"/> Implement proposal with no amendments <input checked="" type="checkbox"/> Implement proposal taking account of mitigating actions (as outlined above) <input type="checkbox"/> Reject proposal due to disproportionate impact on equality, poverty and socioeconomic disadvantage	
Reason for Recommendation	
<p>Parents/carers who took part in our survey were enthusiastic about the opportunity to purchase extra nursery hours. The scheme benefits children by offering continuity within our high quality childcare establishments. Mitigations are in place to try to reduce any adverse impacts for parents/carers due to any barriers in accessing the service.</p>	
<b>Signed by Lead Officer</b>	Hannah Haywood
<b>Designation</b>	Customer Services Manager
<b>Date</b>	06/10/2022
<b>Counter Signature</b> (Head of Service or Depute Chief Executive responsible for the policy)	 Greg Welsh
<b>Date</b>	24/10/2022

- **Integrated impact assessment completed**
- **Final assessment must be published on the council website once the decision to implement has been agreed:**  
[Council EQIA Publication Page](#)
- **Link must be included in “Background References” section of committee/management reports**