

# Equality Analysis Guidelines 2023

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## Why do we choose to do Equality Analysis?

*\* Throughout this guidance the term 'policy' is used to include a wide range of activities, for example processes, practices, provisions and procedures*

### Rationale

Equality Analysis is a core aspect of our organisational Values and strategic ambitions to be the most inclusive university of our kind, anywhere. Our day-to-day decisions, overarching policies and associated processes all affect individual students, members of staff and visitors, often significantly and in variable ways. A policy, process or decision that may seem fair and apply equally to everyone may, on closer inspection, adversely impact on a particular group of people. This means we must take the necessary action and steps to understand and address any inequities, barriers and differential outcomes that may exist for particular groups.

As a university, Queen Mary has legal duties under the Public Sector Equality Duty (Equality Act 2010) which govern the way we should act and make decisions. Equality Analysis enables us to ensure we are compliant with these duties. More information is provided on the legal context below. Our commitment to becoming the most inclusive university of our kind means that our approach to Equality Analysis should be bold and ambitious. To achieve our strategic mission, we must go beyond what we are required to do under legislation, focusing on how we can create the most positive, most inclusive and most impactful decisions and outcomes for our diverse community.

Equality Analysis provides a framework to guide us through how to ensure the impact of a policy, process or decision is analysed and assessed from the beginning planning stages to ensure any adverse impact on a particular group or groups is addressed prior to development and implementation. Equality Analysis also provides the opportunity to consider how our decisions can progress positive impact across different groups, recognising our strategic aims and ambitions.

Equality Analysis is also about embedding an inclusive culture across the organisation, where the needs and voices of different groups are heard and considered in decision-making to ensure positive impact. The Equality Analysis Framework aids transparency and collaboration in decision-making, ensuring consideration of the diverse needs and experiences across the organisation.

### How and why are we including embedding Values in this process?

As part of planning and decision making, we must ensure we are considering and embedding Queen Mary's [Values](#), demonstrating our Values in action. Our [Values in Action](#) framework translates our Values into a description of the expectations that we should have of ourselves and of each other; of how we act and interact with each other every day.

At institutional level, Queen Mary's Values are embedded within our strategic decision-making processes. At a localised level, for example within faculties and directorates, or schools and departments there may not be a formal decision-making framework in place to support this. The Equality Analysis framework includes a prompt to consider the Values, this should include considering whether any additional steps can be taken to ensure the Values are embedded into the core of our policies, practices and decision making.

## Legal context

As a university, Queen Mary has legal duties which govern the way we should act and make decisions. The Equality Act 2010 includes the Public Sector Equality Duty (PSED) which has three aims and states that we must have 'due regard' to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- advance equality of opportunity between people from different groups. This involves considering the need to:
  - remove or minimise disadvantages suffered by people due to their protected characteristics (see explanation below)
  - encourage people with protected characteristics to participate in public life or in other activities where their participation is low
- foster good relations between people from different groups. This involves tackling prejudice and promoting understanding between people from different groups

The protected characteristics under the Equality Act 2010 are:

- Age
- Disability
- Gender re-assignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Marriage and Civil Partnership (only in terms of discrimination in employment)

In order to demonstrate 'due regard', the University must consider the three aims of the PSED (detailed above) when making decisions as an employer and as an education and service provider; for example, when:

- developing, evaluating and reviewing policies and practices
- designing, delivering and evaluating services, including education provisions
- commissioning and procuring services from others.

This means that any decision made (including the cumulative effect of any decisions taken), any policy developed or reviewed, any planned restructuring of a department or change programme must be examined to determine whether it could have a negative impact on particular groups of people protected under the Act.

This is particularly important as the legislation protects people both in terms of **direct discrimination** but also **indirect discrimination**. Indirect discrimination can occur when a provision, criterion or practice is applied equally but disadvantages people from a particular group and cannot be objectively justified. Queen Mary provides training to enable staff to learn more about equality, diversity and inclusion. Introducing Inclusion e-learning looks at equality and diversity in practice, including discrimination as well as challenging unconscious bias. This training is available to all staff within the university and can be accessed through [QMPlus](#).

It is worth remembering when looking at impact that the legislation also requires us to make [reasonable adjustments](#) for staff and students to enable them to fully participate in employment and education. In Equality Analysis we must therefore ensure that any Equality Analysis Guidance 2023

indication of adverse impact specific to disability are actively addressed prior to implementation. Whilst some adverse impacts may be justified (see detailed guidance notes), this is not the case for any adverse impact linked to disability. Under the Equality Act 2010, organisations have a duty to remove, reduce or prevent any obstacles a disabled person may face, where it's reasonable to do so<sup>1</sup>.

Equality Analysis is an established and credible tool through which organisations can demonstrate due regard to the PSED both in terms of addressing potential negative impact as well as supporting and progressing positive impact. We have a legal obligation and are committed to publishing evidence that we have considered the aims of the PSED when formulating policy and making decisions. Previous Equality Analysis completed at Queen Mary can be [found here](#). We also regularly publish equality, diversity and inclusion reports which can be [found here](#).

### **What does this mean in practice?**

Equality Analysis involves taking an evidence-based approach to identify and consider the potential impacts of a proposed policy, practice, process or change, including engaging with key groups and stakeholders. This enables us to address any potential adverse impacts prior to implementation and supports us to actively consider how we support equality, diversity and inclusion in the decisions we make.

Equality Analysis can be understood in two phases, see diagram below; the first phase includes identifying your key stakeholders, the relevant governance process and the information/data that needs to be gathered, including who you might need to engage with. The second phase focuses on reviewing the information gathered and input received, assessing potential impact and opportunities to inform your decision.

This is done for the following reasons:

- to consider if there are any unintended consequences for some groups.
- to consider if a policy or decision will be fully effective for all target groups.
- to identify any negative impact and eliminate or mitigate this before implementation.
- to actively consider opportunities to advance equality, diversity and inclusion and embed our Values.
- to ensure cost efficiency by actively considering user needs before implementation, avoiding decisions that may result in additional resource costs at a later date.

It is important to remember that Equality Analysis is not about justifying what you have done after you have done it. It is about considering our diverse community and the various experiences of and impacts on people to inform your planning and decision-making. Considering the equality impacts should begin from the outset of your policy scoping and planning and is a core part of leadership in decision-making.

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<sup>1</sup> [In employment: Workplace adjustments | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

## Leading and contributing to Equality Analysis

*This guidance document is accompanied by the Undertaking Equality Analysis e-module. It is expected that you complete this e-module before undertaking an equality analysis exercise.*

### Do I need to do an equality analysis?

Equality analysis should be undertaken for any proposed change which will have an impact on individuals at Queen Mary (this includes visitors to the university). It is important that equality analysis is embedded as part of all decision-making processes at Queen Mary. The guidance below will help you to determine what level of action you need to take and how you might use the framework.

### What level of action do I need to take?

The scale of analysis and approach taken will vary depending on the policy being considered and the particular governance pathway. The scale of equality analysis should be proportionate to the scale of change being proposed and the level of impact it is expected to have. The equality analysis e-learning resource provides helpful guidance for considering proportionality, including guidance for small, medium and large-scale changes.

For **institutional level policies**, equality analysis is signposted and embedded within our institutional strategic decision-making process. This aligns closely with the overall approach of equality analysis, in particular the first phase of the process. Leaders and managers should use their discretion as to how to undertake equality analysis for institutional level policies ensuring focus on the aspects which are not already required as part of the existing governance processes.

For **localised and devolved policies**, the decision-making process will vary, therefore it is the responsibility of the leader of the equality analysis and relevant governance or project group to ensure equality analysis is appropriately undertaken. Equality analysis should be considered at the earliest possible stage and factored into project and governance timelines. Where equality analysis is not already embedded it is advised you follow the framework provided here. The scale of equality analysis should be informed by the level and breadth of impact expected.

When beginning your equality analysis, consider what potential impacts for different groups you might anticipate the policy having, as well as what scale the impact(s) might be. You can use the list of protected characteristics for reference; the potential impact on these groups should be considered a minimum in line with the legal context. This will indicate what you will need to investigate and inform the scale of information gathering and analysis required. The following questions may help you:

- Is this a significant change to previous or current policy or practice?
- To what extent has this change been already examined and evaluated in the context of impact?
- What is the level of risk associated with the change in relation to individuals and groups?
- What scale of impact to individuals will or could this change have?

The scale of information gathering and engagement with key groups should be informed by what information is already available. For example, recent staff survey results may provide

the necessary qualitative data you need to inform your assessment of impacts. The legal context outlined earlier in this document should also inform your decision on proportionality. Examples of previous equality analysis exercises are [available here](#), which provide an indication of appropriate proportionality. Further guidance can be provided by the [EDI Team](#).

## What is my role in leading or contributing to Equality Analysis?



### I am leading an equality analysis.

Leaders and managers across Queen Mary are responsible for leading Equality Analysis, taking ownership and accountability for the process. Equality Analysis is a core part of policy and decision-making and should therefore be led by those directly involved and responsible for the change being made.

#### Governance and project management

Leaders of equality analysis are responsible for identifying how and where their equality analysis is embedded into the decision-making route relevant for their policy or project. Where Equality Analysis is not already embedded within the governance or project management process the leader and relevant team or governance group should work collaboratively to agree an appropriate approach.

Leaders also need to support members of the relevant groups to understand the importance of Equality Analysis and the responsibilities and role of the group in this process. When sharing the findings of the equality analysis with members of these groups, leaders and managers need to ensure these groups are equipped with the context and knowledge to make an informed decision.

#### Working with key stakeholders

Leaders responsible for Equality Analysis should take a collegial approach, working collaboratively throughout the process with key stakeholders to ensure their perspectives and considerations are heard and considered. This includes creating spaces and opportunities for key stakeholders to review the proposed change and to contribute into the equality analysis process. Leaders should consider how they bring key stakeholders on board and support them to engage in considering potential impacts.

It is important to consider and identify your key stakeholders at an early stage to bring them into the process, to gather their input and feedback, to inform the planning and development of the policy. A Stakeholder Radar template is provided in the appendix of this document to help you to identify your key stakeholders.

#### Engagement and feedback

Leaders of Equality Analysis should take an evidence-based approach to inform their analysis of impact to ensure the experiences and perspectives of our diverse community inform our decision-making. This should include both consideration of qualitative and quantitative data. The necessary data may be readily available, on our data dashboards or through recent engagement exercises such as surveys. Where further information is required to accurately understand potential impacts, an engagement exercise should be planned. The approach taken should also be informed by the expected scale of impact.

Detailed guidance on engaging with key groups is provided below including considerations around ensuring engagement with key groups is inclusive and accessible. Within the engagement itself, leaders need to demonstrate our Values in action and should be open to

hearing contributions, feedback and recommendations in the spirit of collegiality. Guidance and coaching questions to support leaders in undertaking these exercises are provided below. Our equality analysis e-learning module also provides guidance and support here.

#### Assessing impact and identifying action

A key focus of the second phase of Equality Analysis is assessing potential impact and taking action accordingly. Leaders are expected to take ownership of the assessment of impact and action planning. This includes allocating time to comprehensively assess the full range of evidence and information gathered to inform an assessment of impact. The analysis should not be done in isolation. Whilst the gathering and assessing of evidence and information is led by the leader of the equality analysis, conversations and considerations around what this indicates should be collaborative, informed by diverse perspectives both in terms of characteristics as well as roles within the organisation. As outlined above, leaders should consider the key stakeholders required to contribute to this, working collaboratively and welcoming diverse perspectives.

Our approach to Equality Analysis should be ambitious; in reviewing equality considerations, leaders should be led by our mission to be the most inclusive university of our kind and our [Strategy 2030 KPIs](#). The analysis undertaken should consider mitigating for potential adverse impact as well as opportunities to progress positive impact, particularly for underrepresented groups.



#### **I am a member of a team, governance or project group responsible for considering this policy.**

To be effective, the Equality Analysis process should be considered as a core part of decision-making, which may happen within a governance group a project management group or within a team, for example. Groups making decisions are expected to consider the equality analysis alongside the change being proposed; it should be embedded within the process being used. Where Equality Analysis is not already embedded members of the group should work with the leader of the equality analysis to agree an approach. This should happen at the earliest possible stage. These groups are also required to consider the scale of Equality Analysis required that is proportionate to the change being considered. Guidance on determining the scale of equality analysis required can be provided above.

Members of the relevant decision-making group(s) should be invited to review and comment on equality analysis findings alongside proposals brought to them. Members should familiarise themselves with Queen Mary's approach to equality analysis and what should be considered as part of this exercise.

In considering a proposal, team/group members should consider the findings from the equality analysis and the actions proposed to mitigate negative impact and whether these are sufficient to make an informed decision regarding implementation. Groups are accountable for the decisions they make, this includes reviewing equality analysis as part of approving decisions. This also includes providing scrutiny and constructive challenge when reviewing an Equality Analysis to support us to realise our mission to be the most inclusive university of our kind.

Questions that groups may want to ask to inform their assessment include:

- Do we have assurance that all related equality impacts have been appropriately considered?

- How do the policy proposal and approach taken align with and demonstrate our Values in Action?
- How does the policy support our strategic aims to be the most inclusive university of our kind?
- Has the appropriate level of engagement with key stakeholders and representative groups been undertaken?
- Is there appropriate action identified to address any adverse impact that has been identified?

Groups are also responsible for agreeing how reporting on the monitoring and review of a policy and the equality impacts will be considered. Our Equality Analysis guidance asks leaders to identify how the impact of the policy will be monitored and reviewed. This should be done collaboratively with the relevant group. The ownership and accountability for this review should sit within the relevant governance process.



### **I have been invited to engage in an equality analysis exercise.**

As outlined above, engagement with staff and consideration of qualitative data is a key component of the Equality Analysis process. Leaders of equality analysis will identify the level of qualitative data required to inform their equality analysis. This will include consideration of existing qualitative information to inform whether additional staff engagement is required. Where further engagement and feedback is required, leaders should look to understand in more depth the potential impact of their proposed policy.

You may be invited to be part of an engagement exercise in relation to one or more of the following roles/responsibilities:

- Member of a relevant working group or committee
- Member of a staff affinity network
- Service provider
- Service user
- Staff with responsibility for implementing the relevant policy
- Leaders and managers across Queen Mary
- Head of School / Institute Director
- Subject matter expert relevant to the policy

The way in which the engagement exercise is undertaken will vary and is dependent on the approach to Equality Analysis and context of the policy development. Leaders responsible for undertaking the analysis will outline the approach and means through which you can share your feedback.

The capacity in which you have been invited contribute may inform how you consider the policy and any potential impacts. For example, if you have been engaged as part of a staff affinity network relating to a specific protected characteristic, you should ensure your equality considerations reflect this. Your contribution should not, however, be limited to this if you have further feedback to share. This is particularly important in ensuring contributions consider intersectionality.

When invited to be part of an equality analysis engagement exercise you will be asked to consider the proposed policy and the potential impacts you anticipate it may have. In contributing you may wish to consider:

- How this policy will affect you and others in the same group or role as you?

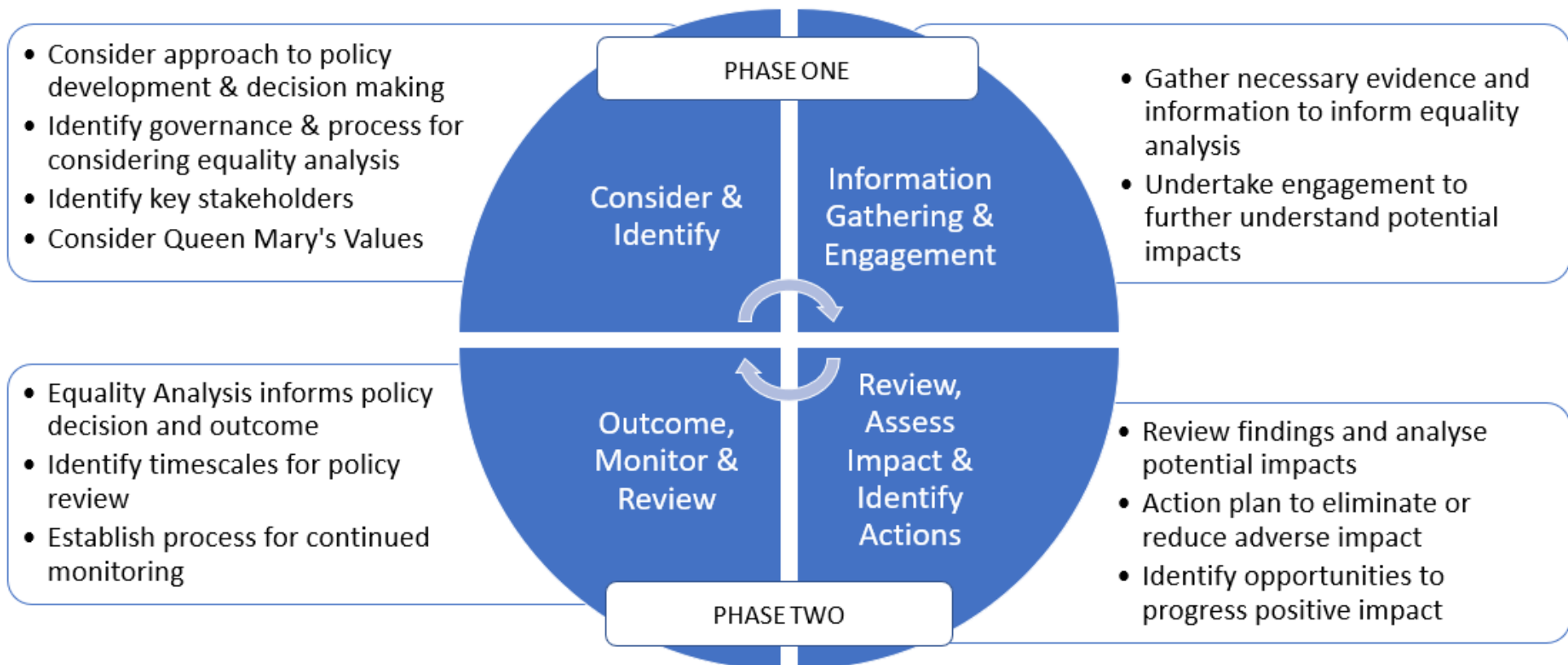


- How does the policy support our aims to be the most inclusive university of our kind?
- How does the policy address any existing barriers, challenges and disadvantages that are known to exist for specific groups?
- How you would be able to access, understand and use the policy?
- What feedback, evidence or information are you aware of that could contribute to this equality analysis?
- How would you work with this policy e.g., how would you implement it in your role?
- Are there additional considerations that this equality analysis has not yet explored?
- Are there any specific recommendations or changes you would suggest?

## Equality Analysis Framework

A framework is provided to guide those completing Equality Analysis through the considerations and components of this activity. How you utilise this framework is discretionary; it is designed as a tool to support you in undertaking a meaningful and comprehensive equality analysis exercise. Leaders and managers may wish to adapt this template to best fit their context. This framework maps directly to the equality analysis template to undertake your analysis.

There are four components to the analysis, these are shown in the diagram below and make up the framework used in the template provided. Each component is outlined in more detail in the appendix below. To best enable a meaningful Equality Analysis leaders and managers are encouraged to consider their specific policy change and how best to utilise and engage in these components. The order below is a suggestion, it is the engagement with each of these components which is important, not the specific order. Consideration of the governance routes, opportunities for engagement and collaboration will inform how you undertake your analysis.



## Appendix 1 - Detailed guidance notes

These guidance notes explain how each of these components could be approached as part of Equality Analysis. These notes are to support the template provided for leaders undertaking the analysis.

Questions are provided throughout to provide a framework for thinking through each component and the impact or effect on people of your decision-making. The priority is to eliminate or mitigate adverse impact on specific groups as well as to consider opportunities for progressing equality, inclusion and diversity for groups where inequalities or under representation exists.

For institutional level policies, phase one of this process may have already been considered and/or undertaken as part of institutional level decision-making governance. Therefore, if you are clear on this already, there is no expectation to repeat this as part of your equality analysis however, the guidance and questions throughout below may still be useful. Where you have already undertaken aspects outlined in Phase One you should move to focus on the aspects outlined in Phase Two.

Please note, whilst engagement with key stakeholders is a specific component, it should be undertaken throughout the entirety of this process and beyond, across your total decision-making process.

### Phase One

#### Consider & identify

##### 1. Consider your approach to undertaking equality analysis

You need to have a clear understanding of your policy and how you will consider Equality Analysis in your decision-making approach. For all Equality Analysis you should consider who should be involved in your analysis and the wider decision-making process; the analysis should not be undertaken in isolation or by one person only.

Where you have not yet considered this, for example in more localised decision making, begin your analysis by considering your key stakeholders, key engagement groups, governance routes and how you will embed Equality Analysis, ensuring representation from diverse communities throughout the policy development process.

Consider:

- How will you embed the analysis in your decision-making for this policy development?
- What is the governance route and how will equality considerations be included as part of the decision-making process?
- Who are your key stakeholders?
  - a. Who needs to be involved in the design, development and implementation of this policy?
  - b. Who will use the policy? How and when will they use it?
  - c. Who will be impacted by the policy?
  - d. In what context will it operate?

##### 2. Supporting Queen Mary's Values and Strategy 2030

Equality Analysis is a core aspect of our organisational Values and strategic ambitions to be the most inclusive university of our kind, anywhere. Our commitment to becoming the most

inclusive university of our kind means that our approach to Equality Analysis should be bold and ambitious. To achieve our strategic mission, we must go beyond what we are required to do, focusing on how we can create the most positive, most inclusive and most impactful decisions and outcomes for our diverse community.

In your equality analysis you will need to articulate how your policy supports Queen Mary's Values and Strategy 2030.

It may be helpful to consider:

- What opportunities are there for this policy to progress positive impact across protected characteristics and beyond?
- For example, how does it support existing EDI action plans, how does it support Queen Mary Strategy 2030, including our mission to be the most inclusive university of our kind and to increase representation by gender and ethnicity

At this point, you should also consider how your approach aligns with [Queen Mary's Values in Action](#). The Equality Analysis template includes a table which provides space to evidence how you are putting these into action in your approach to decision making.

For example, how does your policy demonstrate that we are ambitious – aiming for excellence, focussing on outcomes, experimenting.

## Information gathering and engagement

### 3. Evidence and Information

You should undertake an initial consideration of your policy to inform your decision on what information you need in order to undertake your Equality Analysis. The template will also indicate to you what information you should be considering. Consider the relevance of the policy to equality, diversity and inclusion and the proportionality of its potential impact. This should provide a guide as to how much data you need to collect and how much further engagement you might need to carry out.

Questions to help you consider what information you need include:

- What impact considerations are you already aware of?
- Who will be affected?
- Is it a major policy, significantly affecting how functions are delivered across the institution?
- Does or could the policy affect different protected groups differently?
- Does it relate to an area with known inequalities?
- What is the representation of different protected groups within those who will be affected?
- What additional groups may be affected beyond those included in the Equality Act e.g. part-time workers, those with caring responsibilities
- How have previous or existing practices been experienced by different groups? What has feedback indicated?
- What existing barriers or inequalities are relevant in the context of this policy?
- What wider contextual information is relevant
- How will this policy impact on our organisational KPIs to increase representation by gender and ethnicity (*targets to reach 50:50:50 representation by gender and 40:40:40 representation by ethnicity at junior: middle: senior grades by 2030*)

You should consider a range of information, both quantitative and qualitative as well as both internal and national data for benchmarking where relevant. You must ensure you gather enough data to enable an accurate judgement on impact. This should be proportionate to the scale of change and impact of the policy.

If data is lacking, you will need to plan a further collection of evidence to take place. Your HR Business Partner and/or the EDI team can help with this. Remember it is important that the data you are looking to collect is relevant to your equality analysis.

There is a range of data readily available through our data dashboards as well as through local data collection exercises. Information on how to access these:

- [Staff Equality, Diversity and Inclusion Dashboard](#)  
This dashboard contains HESA student and staff data and how our populations compare to the sector. All staff have access.
- [Student Numbers Silver Dashboard.](#)  
This dashboard contains the diversity profile of our students in greater detail over a 5-year period.
- [Staff Profile Dashboard \(Gold Level\)](#)  
This dashboard provides greater detail of the diversity of our staff across Queen Mary.  
The Staff Profile Dashboard is Gold level access, meaning only Directors/Associate Directors/School Managers and Athena Swan Leads have access to it.

Examples of data:

- Diversity profile of staff and/or students
- Levels of service uptake
- Changes in participation rates
- Diversity profiles within recruitment and promotions data
- Survey results, including [Queen Mary staff surveys](#) as well as national surveys such as the National Student Survey
- Evidence of exclusion, proportionally lower responses or under-representation
- Enquiries, feedback, comments, complaints linked to the relevant policy area
- Recommendations from audit reports
- References to the University's Values and mission, [People, Culture and Inclusion Enabling Plan](#) and additional relevant strategies and targets
- References to the [University's EDI publications and data](#)

#### **4. Engagement**

Engagement and qualitative data are essential aspects of equality analysis; equality analysis. You may have the necessary information readily available, e.g., through recent surveys or feedback gathering exercises. Where you require further qualitative data, engagement exercises should be undertaken in the spirit of collegiality, ensuring openness, listening, understanding, co-operation and co-creation to inform decision making.

Think about which groups you need to hear from. This should include both users of the policy and staff responsible for implementing and delivering the policy. Consider:

- Who are your service users / who will be impacted?
- Who are your key stakeholders, who will be responsible for enacting the policy?

- How are you ensuring consideration of different identities and protected characteristics?
- Which perspectives have you not yet considered or heard from?
- What information do you need to know that you don't already?

When engaging with these groups, you need to be clear on what you need to find out, leaving space for any additional feedback to inform the policy development. Engagement exercises should be run in an inclusive manner, ensuring all voices are heard. Questions may be informed by the specific areas of the policy, by recent staff survey findings or by recent feedback from service users, for example. For guidance contact the EDI Team.

Once you have the necessary information and data you now need to assess against the additional information that you have gathered to inform next steps. Consider:

- What additional information and insights have you found?
- How has this informed your approach?
- What adjustments or amendments do you need to consider based on these findings?
- Is there any additional information gathering you need to undertake, such as wider engagement and feedback exercises?

## Phase Two

### Review Findings and Identify Actions

#### 5. Assessment of potential impact on different groups

Using the information that you have gathered you can now assess whether your decision has an actual or potential negative impact on any particular groups. You should also consider here whether there is any positive impact or potential for positive impact where inequalities and/or underrepresentation exists. The equality analysis template provides a framework to inform and record your assessment.

Your analysis should seek to understand how the evidence shows whether or not there is an adverse impact. Ultimately you are looking to understand what will or might happen (or not happen) if this policy is implemented in its current iteration. The following questions help you to consider this:

- Are there any particular groups who are overrepresented within those who will be affected?
- Will any groups face increased difficulty as a result of this policy?
- Is access to services/benefits reduced/denied in for any groups in comparison with others?
- Is there evidence of certain groups having lower success rates in particular processes?
- If the policy includes an eligibility criterion, could this disadvantage certain groups?
- Does this policy adequately address any existing equality issues that you are aware of?

There may be cases where differential impact is justifiable, for example:

- to address the needs of a particular group through positive action
- for business delivery reasons
- for health and safety reasons

- for security reasons

As part of your equality analysis, you also need to examine whether any instances of negative impact identified are justifiable. Liaise with your HR Business Partner and/or the EDI Team if you believe that a negative impact on a particular group may be justified. In these circumstances, it must be made explicit why this is the case.

## 6. Action plan to eliminate or reduce adverse impact

Based on your analysis and any identification of adverse or negative impact, there will be action that you need to undertake. You need to investigate why there might be an adverse impact and what you can do to address it. The following questions can assist with your action planning:

- What are the causes of the adverse impact?
- What adjustments can be made?
- Are there any alternative measures or interventions that would achieve the intended aims of the policy/decision without having an adverse impact?
- Are there any additional measures which could be adopted that would further equality of opportunity in the context of the policy?

It is important that your action planning is SMART: Specific, Measurable, Achievable, Relevant, Timebound.

You may wish to undertake further data collection here to inform your action planning and ensure your actions are appropriate to effectively address adverse impact.

## 7. Decision

Decision-making should be based on a clear understanding of the effects on equality, which means that the person who ultimately makes a decision or decides on the policy, has to be fully aware of the findings and have due regard to them in making decisions.

Having considered the potential or actual effect of your policy on equality, you should be in a position to make an informed judgement about what should be done with your policy. This decision should be made within relevant governance processes; governance groups should consider policy proposals alongside their analysis exercise to ensure a full consideration of impact to inform decision-making.

There are four main decisions based on your equality analysis findings:

- **No major change** – your analysis demonstrates that the policy is robust and the evidence shows no potential for adverse impact or discrimination and that you have taken all appropriate opportunities to advance equity, diversity and inclusion. If this conclusion is reached, remember to document the reasons for this and the information that was used to make this decision. Your equality analysis should be reviewed as part of the wider decision-making process within governance.
- **Adjust the policy** – this involves taking steps to remove barriers or to better advance equality, using the action plan you have developed as part of the equality analysis. This can include introducing measures to mitigate the potential effect, for example taking positive action where there is a need for it. It is both lawful and a requirement

of the general equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

- **Continue the policy with agreed actions to address adverse impact** – There may be existing adverse impacts or missed opportunities to advance equality that you are aware of that can't be addressed within the timescales of your project. However, you have agreed actions to address these within a specific timeframe to ensure these are addressed before the next iteration of the project. Provided you have satisfied yourself that it does not unlawfully discriminate and that any adverse impact is justified in the first iteration, and will be addressed moving forwards, you can move forward with implementation. It is particularly important that you record the objective justification for continuing to implementation, and how you reached this decision. This decision should be made as part of wider decision-making processes to ensure continuation of the policy is appropriate and justifiable.
- **Stop and remove the policy** – if there are adverse effects that are not justified and cannot be mitigated, you will need to consider stopping the policy altogether. If a policy shows unlawful discrimination, it must be removed or changed. In this instance, you should return to the beginning stages of your equality analysis to revisit the process to inform further policy development.

## 8. Monitor and review

Equality Analysis is an ongoing process that does not end once a policy or decision has been agreed or implemented. This does not necessarily mean repeating the Equality Analysis, but using the experience gained through implementation to check the findings and to make the necessary adjustments.

Completed Equality Analysis documentation should be kept for record by the relevant policy owner and relevant governance group. Please also share your completed Equality Analysis with the EDI Team ([hr-equality@qmul.ac.uk](mailto:hr-equality@qmul.ac.uk)) so that it can be shared to inform future equality analysis exercises. The EDI Team will review a sample of completed Equality Analysis documents annually.

Where policies undergo regular review, the equality analysis should also be reviewed and revisited to ensure considerations are continually made.

Remember that circumstances change over time, including but not limited to:

- demographics can change which may lead to different needs
- alternative provisions can become available
- new options to reduce an adverse effect could become apparent

Where appropriate, the policy/decision should be reviewed at a future date which should be identified and clearly stated as part of the analysis. The length of time between one analysis and the next depends on the relevance of the policy to equality issues and any potential impact on groups with protected characteristics.

It is suggested that an impact analysis of new policies is done after one year. For existing policies, equality analysis should be reviewed in alignment with policy review cycles.



## Appendix 2

### Stakeholder Radar Tool

