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Y Garfan Amrywiaeth a Chynhwysiant Cyngor Rhondda Cynon Taf, gweithio gyda chi, gweithio gyda'n gilydd



Equality Impact Assessment Guidance

Mae'r ddogfen hon ar gael yn Gymraeg / This document is also available in Welsh.

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1. KEY TERMS

Decisions of a Strategic Nature	Strategic decisions are those which affect how the relevant public body fulfils its intended statutory purpose (its functions in regards to the set of powers and duties that it uses to perform its remit) over a significant period of time and will not include routine 'day to day' decisions.	
Communities of Interest	Those who share one or more of the protected characteristics listed in the Equality Act 2010 can be considered communities of interest.	
	Groups of people who share an experience, for example, people who have experienced homelessness, the health and social care system or a local service. It is likely that people will reflect several communities of interest.	
	Those who share an identity can similarly be communities of interest too, for example, lone parents and carers.	
Communities of Place	Refers to people who are linked together because of where they reside, work, visit or otherwise spend a substantial portion of their time.	
Due Regard	Giving weight to a particular issue in proportion to its relevance.	
Inequality of Outcome	Inequality of outcome relates to any measurable differences in outcome between those who have experienced socio- economic disadvantage and the rest of the population.	
Intersectionality	Recognising the way in which power structures based on factors such as gender, race, sexuality, disability, class, age and faith interact with each other and create inequalities, discrimination and oppression.	
	One single form of discrimination cannot and should not be understood in isolation from one another. A truly intersectional approach ensures that this does not happen.	
Key Decision	 The Council defines a 'Key Decision' as: "a decision, which is likely: a) to result in the relevant Local Authority incurring expenditure which is, or the making of savings which are, significant [] or b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions." 	

Protected Characteristics	Refers to groups that are protected under the Equality Act 2010. It is against the law to discriminate someone because of: age disability gender reassignment marriage and civil partnership pregnancy and maternity race religion or belief sex sexual orientation More information on the protected characteristics is available here.
Public Sector Equality Duty (PSED)	A duty contained within the Equality Act 2010 with the purpose of integrating consideration of equality and good relations into the day-to-day business of public authorities. More information on the PSED is available <u>here</u> .
Socio-economic Disadvantage	Living in less favourable social and economic circumstances than others in the same society.

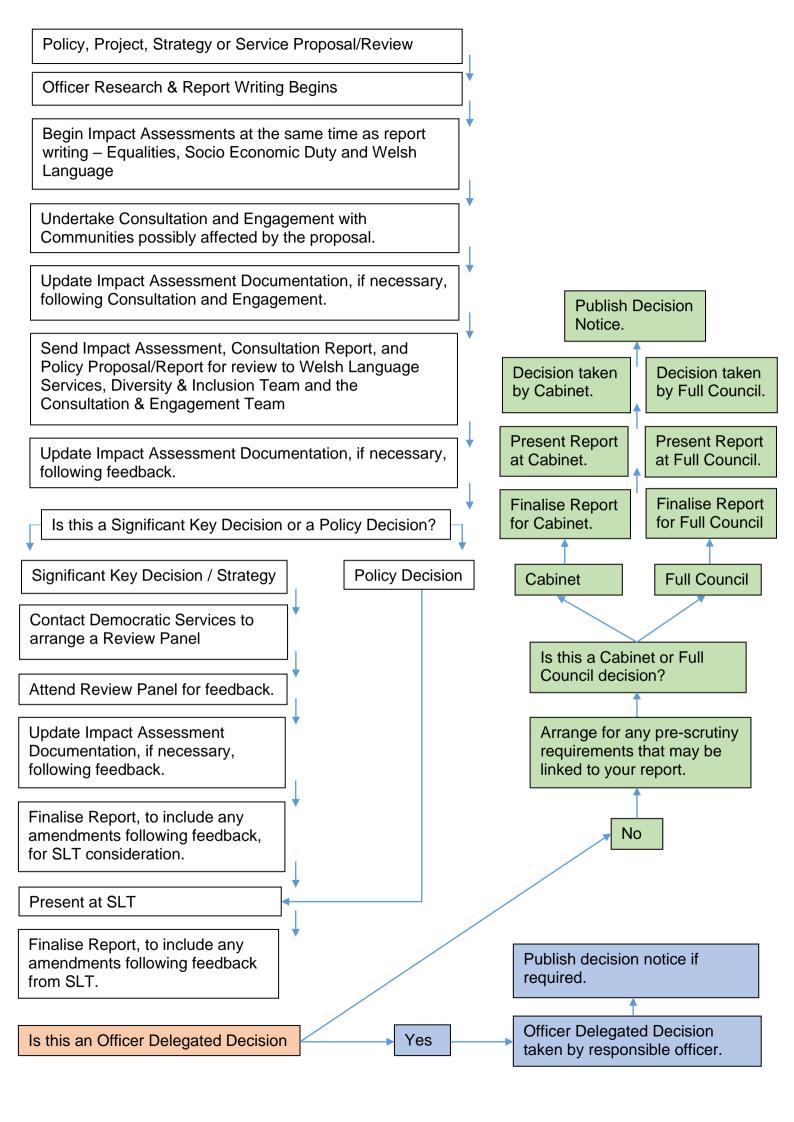
2. INTRODUCTION

These guidelines have been developed to assist managers in completing an Equality Impact Assessment (EqIA) on new or revised proposals. The Diversity and Inclusion Team will provide appropriate assistance to support colleagues as required.

An EqIA is an essential tool in developing your business case for a proposal in respect of a change of function, service or policy. The tool will prompt you to consider the evidence base for your proposal. If you do not consider how a proposal can affect different groups in different ways, it is unlikely to have the intended effect. This can contribute to greater inequality and poor outcomes.

3. IMPACT ASSESSMENT PROCESS OVERVIEW

Below is an overview of the process to follow, integrated with the Welsh Language Impact Assessment you may also need to complete.



4. EQUALITY IMPACT ASSESSMENT POLICY STATEMENT

Rhondda Cynon Taf Council is committed to promoting equality of opportunity in all its activities. We aim to be an inclusive Council that values and respects all employees, job applicants, customers, residents living in our area and visitors coming to the area. We believe that everyone living in and working in Rhondda Cynon Taf has the right to be treated fairly and to live free from discrimination.

We will work to ensure that everyone in our communities are able to access our services and information. We will consider people's different needs as we develop our services and practices and aim to ensure that our approach is inclusive of everyone.

As employers, we will work to promote a positive working life for all employees. We aim to create an inclusive workplace culture that is free from harassment and discrimination whereby people's differences are respected and valued.

We aim to promote an environment in Rhondda Cynon Taf whereby we challenge prejudices, stereotypes and negative assumptions about people and groups of people.

5. LEGISLATIVE FRAMEWORK

As a public body the Council must comply with the statutory duties contained in the Equality Act 2010.

5.1 Public Sector Equality Duty

The aim of the Public Sector Equality Duty (PSED) is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services and that they are kept under review. This will achieve better outcomes for all.

Public bodies are required to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

5.2 Socio-economic Duty (Strategic Decisions Only)

The introduction of the Socio-economic Duty in March 2021 means that we now have to think about how strategic decisions, such as setting objectives and developing public services, can improve inequality of outcome for people who face socio-economic disadvantage.

The Welsh Government believe the duty to be a key mechanism in supporting the most vulnerable in our society.

5.3 Due Regard

In respect of equalities law, the Council must pay due regard to the decisions it makes. This means giving weight to a particular issue in proportion to its relevance. Due regard is an established legal concept in equalities law. The impact assessment is a tool to help demonstrate that due regard has been given to proposals. Elected Members, Senior Leaders and the Review Panel will be asking themselves the following questions in relation to your proposal, as to whether due regard has been demonstrated:

1.	What evidence has been considered in preparing for the decision, are there any gaps in the evidence?
2.	What are the voices of people and communities telling us? (Including those with lived experience of socio-economic disadvantage).
3.	What does the evidence suggest about the decision's actual or likely impacts regarding inequalities of outcome as a result of socio-economic disadvantage?
4.	Are some communities of interest or communities of place more affected by disadvantage in this case than others?
5.	What does our impact assessment tell us about gender, race, disability and other protected characteristics that we may need to factor into our decisions alongside those suffering socio-economic disadvantage?
6.	What existing evidence do we have about the proposal being developed, including what could be done differently?

As Lead Officer it is important you reflect upon the above questions to ensure you have demonstrated the evidence for these sufficiently in the equality impact assessment tool. Failure to do so may result in delays in decision making on your proposal. Also, failure to sufficiently pay due regard the PSED and Socio-economic Duty may result in an individual or a group initiating judicial review proceedings.

Further information on the concept of due regard is available below:

• Equality and Human Rights Commission – Making fair financial decisions

• <u>Welsh Government – Preparing for the Commencement of the Socio-</u> economic Duty.

6. WHAT IS AN EQUALITY IMPACT ASSESSMENT?

EqIA's allow us to assess and record the likely impact of initiatives on individuals and groups in the workforce or in the community.

EqIA's help the Council meet the requirements of the statutory equality duties and identify active steps that can be taken to promote equality.

Carrying out an EqIA involves systematically assessing the likely (or actual) effects of proposals on people in respect of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. This includes looking for opportunities to promote equality of opportunity as well as positive or negative impacts.

7. WHEN DO I START THE EQUALITY IMPACT ASSESSMENT PROCESS?

It is important that you start completing the EqIA form as soon as possible, as it is an essential tool to assist you in developing your business case. The form is designed to reflect the natural path you follow when assessing impact and the decision should already be included within the Cabinet/Council Work Programme if it is a <u>Key Decision</u>.

Make sure you leave enough time to complete the full assessment process, as you will be required to continually update to reflect any feedback from the Diversity and Inclusion team, the Consultation & Engagement team and/or Review Panel recommendations before the report is considered by the relevant decision maker pathway. There should also be the opportunity for potential pre-scrutiny of the decision if appropriate.

The form is designed so you can add information to reflect your consultation and engagement findings. You need to show the positive and negative impacts that you have found from your consultation with stakeholders and community groups that your decision is likely to affect.

8. WHAT IS THE SCREENING PROCESS?

The first stage is screening your proposal.

Screening is used to determine what impacts affect any of the protected groups. These impacts could be positive, negative or neutral. Negative impacts on any of the protected groups will require a full EqIA to be undertaken. Not all proposals need an EqIA, e.g. some technical procedures or internal policies may have no bearing on equality and diversity issues and therefore will not have any impact at all.

The screening test section of the EqIA form is designed to make the process as easy as possible and to ensure that any information gathered at the screening/relevance stage can be used if a full EqIA is required.

9. WHAT DO WE MEAN BY IMPACT?

When we assess our proposals, there are three possible impacts we may identify:

9.1 A Negative or Adverse Impact

This is where it is identified that the proposal (or some aspect of it) may disadvantage one or more sections of the community. The adverse or negative impact may present different disadvantages depending on the section of the community affected and may be more disadvantageous for some than others. A negative impact may be entirely unintentional and only become apparent when research or consultation takes place.

A negative impact may also occur when there is a proposal removed or discontinuation of a service or initiative. Therefore an EqIA screening should also be conducted during decision-making about whether to end an initiative.

9.2 A Positive Impact

This is where it is identified that an initiative (or some aspect of it) may have a positive impact on one or more sections of a community, or improves relationships between different sections of the community. Again this may have differing effects and may be more advantageous to some than others.

Positive impacts assist the Council to meet its obligations under the PSED and it is important that you also include this information on the screening form.

9.3 A Neutral Impact

This is where evidence identifies that the proposal has no negative or positive results for people with protected characteristics.

To assist you in identifying impacts on protected groups, Appendix 1 describes some potential issues you may wish to consider when working with groups or individuals who have a protected characteristic.

10. GATHERING EVIDENCE

10.1 Data

To support your conclusions in determining impacts on protected groups it is vital that you obtain relevant and current evidence. This evidence can come from a number of sources and be in a number of formats:

External Research and Reports

Relevant publications, journals and reports, for example:

- EHRC Is Wales Fairer (2018)?
- Welsh Government's Future Trends Report
- Chwarae Teg Gender Equality Review
- The Future Generations Report 2020.

External Data Sources

Relevant statistics from the Office for National Statistics and other sources such as think tanks and third sector, for example:

- Welsh Index of Multiple Deprivation
- Census Information
- Bevan Foundation.

Internal Policy and Reports

Relevant internal strategy, policy and reports, for example:

- Cabinet reports
- <u>Corporate Plan</u>
- <u>Strategic Equality Plan</u> and <u>Annual Equality Report</u>
- Cwm Taf Well-being Plan.

Internal Data Sources

The Council holds a wide range of data on employees and customers, for example:

- Workforce data
- Customer equality monitoring information
- Usage data
- Customer satisfaction.

Feedback on Data Sources

When you send the assessment to the Diversity and Inclusion team for their feedback you are also required to forward your assessment to the Consultation & Engagement team – <u>consultation@rctcbc.gov.uk</u>. They will provide feedback on the data used to support your statements and whether any additional consultation feedback could be used. You may also want to speak with the Consultation & Engagement team earlier in your process if you need any help with identifying, accessing and/ or analysing potential data sources.

10.2 Engagement

Involving communities and third sector organisations in decision-making is key to getting decisions right and making sure they achieve positive outcomes.

What is engagement?

Engagement is a broad term which covers a range of different activities, from formal public consultations to direct involvement and engagement with people from protected groups in designing and delivering services. Engagement can tell you where you are successful in promoting equality and inclusion and where action is most needed. It is particularly useful where there are information gaps.

Why engage?

Engagement can help you understand the impact of your proposal on protected groups and those living in socio-economic disadvantage. It will help you gather the views, experiences and ideas of those who are, or will be affected by your decisions. It can help you to base your policy on evidence rather than on assumptions. It can be useful for finding solutions to problems and for overcoming barriers faced by particular groups. Stakeholder engagement can be a valuable way of monitoring and evaluating the success of your initiatives and of understanding where improvements may be necessary. For all of these reasons engagement is a legal requirement within equalities law.

Engagement will help you to design more appropriate services. These are more likely to be effective and make better use of resources. You can avoid the costs of remedying and adapting services after their implementation and pre-empt complaints, which can be costly and time-consuming.

Who should you engage with?

You should engage with those who may have an interest in the initiative you are assessing and particularly with those where the screening has identified an actual or possible negative impact.

In practical terms you will not be able to engage with every protected group on every decision, as a starting point you will need to decide how relevant the initiative is for any particular group or groups. This information should have been identified during the screening process.

How should you engage?

It is vital to be clear from the outset what you want to get out of your engagement, you should consider:

- What are your aims?
- What are the timeframes you have?
- Is there information already in existence that you can use?

• What method/s of engagement will you use?

The Council's Corporate Policy & Consultation Team should be contacted whenever you wish to set up an engagement process as they will be able to help and advise you.

Finally, check your engagement plan against the <u>Gunning Principles</u> shown below. These set out 4 principles for appropriate consultation and can be used to support public bodies in applying fairness in its engagement and consultation.

Principle 1

Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind.

Principle 2

Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

Principle 3

Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances?

Principle 4

The product of consultation must be conscientiously taken into account when finalising the decision.

11. JUSTIFICATION OF NEGATIVE IMPACT

There may be some occasions when a negative impact can be justified, this will be determined in a number of ways, some of which are identified below:

- For Health and Safety reasons.
- Where the negative impact is temporary and there is no possibility of reducing or removing the impact (e.g. actions are restricted by other rules/regulations).
- Where the overall positive impact outweighs the negative impact.

This list is not exhaustive; further advice can be obtained from the Diversity and Inclusion Team.

If there is any possibility that the negative impact is directly or indirectly discriminatory and it **cannot** be justified then actions must be taken to remove any discriminatory elements; if this is not possible then the proposal must be stopped.

Where negative impacts are identified a full EqIA **must** be carried out.

12. WHEN SHOULD I THINK ABOUT CARRYING OUT A FULL EqIA?

If the initial screening process has identified negative impacts on a particular group or groups then you **must** carry out a full EqIA.

The EqIA process also applies to all projects for which the Council is the lead agency in a multi-agency partnership.

13. ASSESSING THE IMPACT OF SOCIO-ECONOMIC DISADVANTAGE

When making 'strategic decisions' the socio-economic duty requires us to consider how decisions might help reduce inequalities due to socio-economic disadvantage.

13.1 What is defined as a 'Strategic Decision' within the duty?

Below are some examples (not an exhaustive list) of strategic decisions for relevant public bodies:

- Strategic directive and intent
- Strategies developed at Regional Partnership Boards and Public Service Boards which impact on a public bodies functions
- Medium to long-term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Changes to and development of public services
- Strategic financial planning
- Major procurement and commissioning decisions
- Strategic policy development.

All Council 'key decisions' which fall under the remit of the above will require an assessment of socio-economic disadvantage.

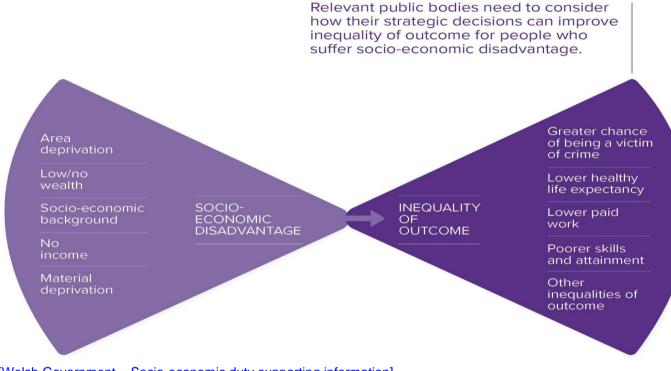
13.2 Evidence and Engagement

In the same way as you have gathered robust research and statistical evidence and engaged with communities and relevant groups for your EqIA, you should replicate this to identify the impact upon people facing socio-economic disadvantage.

It is worth remembering there are colleagues across the Council who have vast knowledge and resources on groups of people and communities that face inequalities of outcome. Ensure you call on these resources to help you build your business case. If you are unsure who to contact, please contact the Diversity and Inclusion team at <u>equality@rctcbc.gov.uk</u> who can advise.

13.3 Examples of Inequality of Outcome arising from Socio-economic Disadvantage

The diagram below highlights how socio-economic disadvantage impacts upon inequality of outcome.



[Welsh Government – Socio-economic duty supporting information]

Socio-economic disadvantage can be disproportionate to both communities of interest and communities of place, leading to further inequality of outcome which can be further exacerbated when considering intersectionality. Below are some examples to help you think about impacts.

Communities of interest

Homelessness. Evidence suggests that health outcomes for people experiencing homelessness are significantly worse than the general population. Taking an intersectional approach highlights the particular vulnerability and complexity for young people, this is further exacerbated if the young person is LGBT or from an ethnic minority. A further example is homeless women, who may endure additional vulnerability due to having a greater risk of being a victim of crime. There are many other inequalities of outcomes for homeless people, these examples provides a small glimpse of issues to consider and research.

[Ref: LGA – The Impact of Homelessness for Health: A Guide for LA's]

Communities of place

The Equality and Human Rights Commission's analysis shows that in 2015/16, one in four (25.3%) adults in Wales were living in relative poverty. In the same year one in three (34.1%) children in Wales were living in poverty. There are some communities in RCT where levels of poverty are more highly concentrated. Taking an intersectional approach highlights that some groups within those communities may be facing further socio-economic disadvantage. For example, disabled people. In 2015/16, disabled adults were more likely to be living in poverty (32.1%) compared with non-disabled adults (22.4%). Disabled people are likely to have poorer education, employment and health outcomes. There may be barriers for disabled people in accessing Council services and transport which do not impact so significantly upon non-disabled people.

[Ref: Is Wales Fairer 2018]

14. REVIEW AND REPORTING PROCEDURES

Where the screening process has identified that there is no need to carry out a full EqIA this should be approved by an appropriate Head of Service or Director and a copy of the form returned to the Diversity and Inclusion team.

Where there is the need for a full EqIA then a complete EqIA form and action plan of how to mitigate against the negative impacts **must** be completed for each proposal. This should be approved by an appropriate Head of Service or Director.

All full EqIA's and those involving Council key decisions and decisions of a strategic nature must be forwarded to the Democratic Services Team at <u>CouncilBusiness@rctcbc.gov.uk</u> for review prior to the submission of your report to Cabinet, for presentation to the Review Panel.

Remember to complete all sections of the EqIA before you forward for a Review Panel to be organised, as Review Panel officers are tasked with reviewing the complete document before it is forwarded to SLT and a decision taken via one of the formal decision routes.

Please make sure you provide the documents at least 5 working days before the Review Panel to allow officers to fully assess your documents in advance. Lack of notice may lead to the Review Panel being delayed.

What is the Review Panel?

The Review Panel will ensure consideration is given to the many different effects of the proposal and will review the impacts identified on our communities and how the proposal may be amended to achieve better outcomes. The panel will act as an additional safeguard to the service area by robustly scrutinising the proposal being considered and the initial impact assessment completed by the Leading Officer, to reduce any potential complaint being taken forward against the Council.

The panel's considerations and those of the lead officer following feedback (and via any engagement exercise) will always be recorded in the impact assessment tools and thereafter be presented to decision makers. The ability to evidence considerations via the impact assessment tools will ensure compliance with the relevant statutory requirements and provide a greater evidence base to our decision makers when making their final decision.

The panel will include the following officers to ensure a structured and robust approach:

- a representative from Democratic Services/Executive Officer Support
- a representative from the Diversity & Inclusion Team
- a representative from the Consultation & Engagement Team
- a representative from Welsh Language Services
- a representative from Legal Services
- a Service Director/Head of Service/Service Manager from another service area than that which is generating the policy proposal.

The panel will be convened by Democratic Services Officers after receiving your impact assessment, proposal/report and consultation report as discussed in the section above. All comments provided by the panel members should be summarised by the Lead Officer in the assessment tool documents.

Reports to Cabinet

All Cabinet Reports request evidence that an EqIA has been completed, and where necessary, confirmation of submission and consideration by the Review Panel. As you will be working in accordance with the Cabinet Work Programme it is **essential** that you build in sufficient time within your project plan to undertake robust engagement, data gathering and submission to the Review Panel. As well as taking into consideration any pre-scrutiny requirements that may be linked to your report.

Substantial Impact

If a 'substantial' impact has been identified the EqIA results must be published on the Council's website along with the Cabinet Report, as required under the Public Sector Equality Duties.

You should ensure that any EqIA that identifies a substantial impact is reported to Corporate Management Team and arrangements made for its publication.

Annually the Diversity and Inclusion Team will publish an Equality Report which will include a summary of EqIA results.

15. CONTACT DETAILS

Further information on this guidance is available from:

Diversity and Inclusion Team Ty Elai 01443 444529

e-mail: equality@rctcbc.gov.uk

APPENDIX 1

15.1 POTENTIAL ISSUES

The table below describes some potential issues you may wish to consider when working with groups or individuals who may have a protected characteristic.

Group	Description	Potential Issues
Disability	that are related to; mobility, sight, hearing, speech and language disability or difficulty, mental illness, learning difficulty or learning disability, chronic illnesses such as cancer and HIV.	Accessibility of formats and communication, signage (e.g. Braille/audio tape/induction loop/easy read).
		Physical and sensory access including transport and the built environment.
	A person might have more than one disability.	Allowing a service user sufficient time for example a person
	The Council has adopted the Social Model of Disability which focuses on getting rid of the barriers such as:	who is deaf, or who has a speech impediment, or a learning disability, will require a longer appointment time to be able to either express fully, their point of view or to take in the information being presented. This also need to be considered
	Badly designed buildings	when organising public meetings, consultations etc.
	No lifts / lifts not working	
	No parking spaces	Many of the barriers people face can be prevented if a little thought is given to how and where a service is provided.
	Hypocritical or prejudiced attitudes	thought is given to now and where a service is provided.
	Poor job prospects	The Council has a legal duty to anticipate the needs of
	Insufficient number of support workers/enablers/	disabled customers and to take reasonable steps to remove or

Group	Description	Potential Issues
	communicators.	reduce barriers that prevent disabled people from accessing services and should take positive steps to ensure that disabled people can access services including making reasonable adjustments. There is also a duty to make reasonable adjustments in terms of employment practice.
Race	Race includes colour, nationality and ethnic or national origins. A person has the protected characteristic of race if they fall within a particular racial group which is a group of people who have or share a colour, nationality or ethnic or national origins.	Communication formats, language needs, translation and cultural consideration.
		Impact of living in a majority white environment.
		Direct and indirect racial harassment and hate crime.
		Consider how cultural issues are taken into account when planning and delivering the service.
		Isolation and work patterns of minority businesses.
		Underachievement or under representation in some areas of work and life.
Transgender	A transgender or transsexual person is someone with a condition called 'gender dysphoria', which means the physical sex characteristics they were born with are	For transgender people it can be very distressing and demeaning to receive services that force them to be seen as

Group	Description	Potential Issues
	wrong for them.	their biological gender.
	Most transgender people wish to live as a member of the gender with which they identify and they are entitled to do so by law.	The Gender Recognition Act 2004 allows transsexual people who have undergone gender reassignment to apply for a gender recognition certificate.
		When a full gender recognition certificate has been issued, the person is considered in the eyes of the law to be of the acquired gender.
Gender	Women/girls, men/boys.	Hours of access.
		Women predominantly have main caring responsibility for young children and older relatives.
		Many lone parents experience high socio-economic inequality.
Gender	Women/girls, men/boys.	Physical access (e.g. pushchairs and toddlers).
		Single fathers - baby changing facilities are often sited in women's toilets.
		Terminology of services preferential to mothers e.g. mother and toddler should be parent and toddler.

Group	Description	Potential Issues
		Stereotypical gender assumptions.
		Underachievement or under representation, balance on groups.
Age	Children, young people and young parents, the elderly or older people, retired.	Assumptions about the age range, capability and generation viewpoints.
		Services should ensure they are not based on age assumptions and take in to account such things as teenage parents, children as carers, and elderly as service users.
Faith or Belief	Communities or individuals with diverse beliefs and religions.	Respecting and reflecting diverse cultures, lifestyles, customs and values for women and men, boys and girls (single sex provision).
	Legislation also covers people who have no religion.	Observing food rules, including rules about preparation and storage of food.
		Observing religious celebrations, e.g. how are service users and staff members allowed to observe religious practices such as fasting during Ramadan?
		It needs to be recognised and understood that not all people who are a particular faith will necessarily conform to all parts of that faith.

Group	Description	Potential Issues
		Within each specific faith there may be individual groups who have different beliefs and practices.
Sexual Orientation	Lesbian, gay, bi-sexual and heterosexual.	Assumptions about partners or family types, invisibility, dignity, and assumptions that all people are in heterosexual relationships. Forms that do not include the options civil partnership/partners.
		Older lesbian, gay and bi-sexual people. Other people may assume they are heterosexual if they are/have been married.
		Rest/care homes may not cater for the needs of elderly gay people.
Income	Low or no income, unemployed, part time and seasonal workers.	Access to personal transport and information technology, child care costs, shift work, double disadvantaged groups (e.g. single young parents, older visually impaired person).
Welsh Language	People who have Welsh as their language of choice, need and/or first language.	Access to services and information in Welsh.
		Having to mentally 'translate' verbal or written information which may alter understanding or perception or expression.
		Impact of living in a majority English speaking environment.

Group	Description	Potential Issues
		Dealing with lack of understanding of the importance of being able to use their language of choice, need and/or first language.
		Dealing with barriers associated with using the Welsh language (lack of opportunity, prejudice).
		Lack of commitment by organisations to use or encourage use of the Welsh language
Other	For example:	Opening hours, accessibility of information, cost and availability of relief care.
	Carers Parents Ex-offenders	Mobility/accessible transport, parking.
	Pregnant Women Armed Forces Community	Toilet facilities. Access to quiet rooms.