



## **EQUALITY IMPACT ASSESSMENT (EqIA)**

### **Summary results of the EqIA**

**Title of policy/ practice/ process/ service:**

Solicitor feedback project

**Is the policy new (proposed), a revision to an existing policy or a review of current policy?**

New

**Key findings from this assessment (or reason why an EqIA is not required):**

Feedback from the profession may be relevant to various protected groups. The central collation and review of feedback gives an opportunity to review this on an ongoing basis.

**Summary of actions taken because of this assessment:**

No major change.

**Lead person(s) for this assessment (job title and department only):**

Policy Projects Manager, Policy and Development

**Senior responsible owner agreement that the policy has been fully assessed against the needs of the general duty (job title only):**

Director of Strategic Development

**Publication date (for completion by Communications):**

10/12/2020



## **Step 1 - Framing the planned change**

Discussing step 1 and step 2 with the Corporate Policy Officer (Equalities) at an early stage will help identify appropriate evidence. This may include support from the wider Policy and Development team.

### **1.1 Briefly describe the aims, objectives and purpose of the policy/ practice/ process/ service.**

The project's purpose is to establish a system of SLAB-wide reporting of feedback and a system of corporate briefing. This will use existing IT infrastructure.

The aim of this project is to deliver an improved system to gather and make use of feedback from solicitors, whilst providing teams with briefing on key issues.

There are a number of objectives:

- Establish a system for gathering, analysis and reporting of feedback
- Use and maintain system for gathering, analysis and reporting of feedback until established as business as usual

### **1.2 Why is the change required?**

SLAB has developed micro-surveys as a key feedback mechanism on customer satisfaction from the profession. This route could be complemented by other opportunities for SLAB to learn about potential priority changes to systems and processes that would improve the customer experience, the sustainability of the overall arrangements or the overall relationship with the profession.

For example, SLAB has multiple teams whose work involves meeting and spending time with solicitors. Each team receives feedback on different aspects of SLAB's work. Some of this is specifically focussed on improvements, such as the user experience work carried out by IS, but others may gain such feedback incidentally. Key functions are training, compliance audit and SLAB's direct services. Currently there is no central place where such insight can be pooled and analysed.



The solicitor engagement work should provide a clearer way to understand the views of the profession on the health of the system overall and what improvements they would like to see, as well as feedback on changes which SG or SLAB may wish to implement.

### **1.3 Who is affected by this policy/ practice/ process/ service?**

The scope is the feedback received from teams whose work involves meeting and spending time with solicitors. Managing the transition to the new system and monitoring implementation will be part of the project. Those directly affected are the staff teams involved in user experience work carried out by IS, training for solicitor firms, compliance audit and SLAB's direct services. Wider operational teams will be affected by this change, as there is proposed to be a feedback form available on IntraSLAB that is accessible to all staff.

The indirectly affected groups are solicitors and applicants, who will be affected by any improvements made due to the feedback that SLAB gathers, but that is out of scope for this project- which is concerned with developing the mechanism for feedback. There may be wider impacts on corporate processes arising from the feedback, but that is out of scope for this project.

### **1.4 Policy/ practice/ process/ service implementation date e.g. *project end date, date new legislation will take effect.***

28/09/2020

### **1.5 What other SLAB policies or projects may be linked to or affected by changes to this policy/ practice/ process/ service?**

There will be links to all SLAB areas of business, as reporting and analysis routes will be intended to provide information of interest to all. This relates as well to the micro surveys and other evidence gathered by SLAB, including through the research workplan.



## Step 2: Consider the available evidence and data relevant to your policy/ practice/ process/ service

The information you gather in this section will:

- help you to understand the importance of your policy/ practice/ process/ service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

### 2.1 What information is available about the experience of each equality group in relation to this policy/ practice/ process/ service?

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
All characteristics	<a href="#">EHRC technical guidance on the Public Sector Equality Duty</a>	The EHRC technical guidance on good practice notes that ongoing monitoring of policies is an integral part of EqIA review. Whilst SLAB currently has routes for gathering and reporting of informal feedback, these are team based and don't allow for a corporate pool from which to draw lessons across different policy areas. This change would therefore enhance SLAB's ability to comply with its equalities duties.



Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		The project will enhance SLAB's ability to maintain ongoing monitoring of policies and provide an additional channel for feedback, beyond specific research, engagement or consultation exercises.
Age	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.
Disability	<a href="#">SLAB's Equality Outcomes for 2017-20</a>	<p>SLAB's evidence underpinning the development of outcomes identified a specific focus on disability as part of our programme of work- "Outcome 2: Minority ethnic people and disabled people experience equal access to quality accessible services and information about legal aid"</p> <p>We might expect feedback from solicitors to cover this equality group.</p> <p>However, in relation to the project itself, of setting up and maintaining a system of analysis and reporting- no evidence or reason to expect that this equality group would have a different experience.</p>
Race	<a href="#">SLAB's Equality Outcomes for 2017-20</a>	<p>SLAB's evidence underpinning the development of outcomes identified a specific focus on race as part of our programme of work- "Outcome 2: Minority ethnic people and disabled people experience equal access to quality accessible services and information about legal aid"</p> <p>We might expect feedback from solicitors to cover this equality group.</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		However, in relation to the project itself, of setting up and maintaining a system of analysis and reporting- no evidence or reason to expect that this equality group would have a different experience.
Sex	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.
Gender Reassignment	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.
Sexual orientation	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.
Religion or Belief	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.
Pregnancy or maternity	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.
Marriage or civil partnership	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.
Care Experienced	None identified	There is no evidence that setting up and maintaining a system of analysis and reporting would have a differential impact on this group.



Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
<i>(corporate parenting duty)</i>		

**2.2 Using the information above and your knowledge of the policy/ practice/ process/ service, summarise your overall assessment of how important and relevant the policy/ practice/ process/ service is likely to be for equality groups.**

The new process for analysing and reporting feedback in itself is important to equality groups, as it will provide a way to corporately monitor SLAB’s policies and procedures, acting as needed on areas of concern or where improvements can be made.

**2.3 Outcome of step 2 and next steps. Complete the table below to inform the next stage of the EqIA process.**

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality or our corporate parenting duties	N	Proceed to Step 5: agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups and/ or our corporate parenting duties	Y	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all of the equality groups and/ or our corporate parenting duties	N	Proceed to Step 3: complete full EqIA

### Step 3 - stakeholder involvement and consultation



This step will help you to address any gaps in evidence identified in Step 2. Speaking to people who will be affected by your policy/ practice/ process/ service can help clarify the impact it will have on different equality groups.

**Remember that sufficient evidence is required for you to show ‘due regard’ to the likely or actual impact of your policy/ practice/ process/ service on equality groups. An inadequate analysis in an assessment may mean failure to meet the general duty.**

The Policy and Development team can help to identify appropriate ways to engage with external groups or to undertake research to fill evidence gaps.

**3.1 Do you/did you have any consultation or involvement planned for this policy/ practice/ process/ service?**

Yes

**3.2 List all the stakeholder groups that you will talk to about this policy/ practice/ process/ service.**

We consulted internally with staff working across the organisation, detailed in section 1.

**3.3 What did you learn from the consultation/ involvement? Remember to record relevant actions in the assessment action log.**

We learned about what currently happens with feedback, as well as appetite for this centralising of change and their preferred modes for submitting information for analysis. The preferred mode of feedback was email, with details and structure as decided by the member of staff providing the feedback.





## Step 4 - Impact on equality groups and steps to address these

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

### 4.1 Does the policy/ practice/ process/ service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

All characteristics	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impact	Negative impact	No impact	
Potential for discrimination	X			In terms of staff being able to access, use and understand the policy and associated processes, there is no potential for discrimination- these are commonly used systems and full briefing will be provided.

				In terms of feedback received relating to solicitors and applicants, there is a positive impact in terms of our ability to centrally review and understand the potential for discrimination across SLAB's wider policies and processes.
Potential for developing good relations	X			<p>There may be a positive impact for staff in better understanding the needs of equality groups and the impact of SLAB's policies and processes.</p> <p>For solicitors and applicants, feedback may lead to changes that improve relations between those who share a protected characteristic and those who do not.</p>
Potential to advance equality of opportunity	X			<p>There is no impact for staff in terms of potential to advance equality of opportunity.</p> <p>For solicitors and applicants, feedback may lead to changes that advance equality of opportunity for particular equality groups. The method of gathering feedback will allow any equality issues to be explored in more depth as required with the staff member providing the information.</p> <p>We will not be gathering the protected characteristics of those solicitors providing the ad hoc feedback, as we do not have a customer relationship management system to match these up and store them securely. It would not be proportionate to ask for this information each time feedback</p>



				is provided in the usual course of business. In terms of feedback about issues relating to applicants, this may indicate if any issues were thought to arise as a result of a protected characteristic, but this information will not be gathered directly from applicants and therefore must be treated with caution.
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Age	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			
Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Sex	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the Potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			



Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Disability	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			
Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Gender Reassignment	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			



Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Race	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			
Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Religion or Belief	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			



Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Sexual Orientation	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			
Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Pregnancy & Maternity	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			



Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Marriage & Civil Partnership	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
Potential for discrimination	X			
Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

Care experienced young people	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	



Potential for discrimination	X			
Potential for developing good relations	X			
Potential to advance equality of opportunity	X			

**4.2 Describe how the assessment so far might affect other areas of this policy/ practice/ process/ service and/ or project timeline?**

No impacts on the application of the policy or processes. Potential additional information on protected characteristics of those providing feedback cannot be gathered.

**4.3 Having considered the potential or actual impacts of your policy/ practice/ process/ service on equality groups, you should now record the outcome of this assessment below. Choose from one of the following (mark with an X or delete as appropriate):**

Please select (X)	Implications for the policy/ practice/ process/ service
X	<p><b>No major change</b></p> <p>Your assessment demonstrates that the policy/ practice/ process/ service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>



	<p><b>Adjust the policy/ practice/ process/ service</b>          You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy/ practice/ process/ service when implemented.</p>
	<p><b>Continue the policy/ practice/ process/ service with adverse impact</b>          The policy/ practice/ process/ service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.</p>
	<p><b>Stop and remove the policy/ practice/ process/ service</b>          The policy/ practice/ process/ service will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>



## **Step 5 - Discuss and review the assessment with decision makers and governance structures**

You **must** discuss the findings of this assessment with senior decision makers during the lifetime of the project/ review and before you finalise the assessment. Relevant groups include, but are not limited to, a Project Board, Executive Team or Board members. EqlA should be on every project board agenda therefore only note dates where key decisions have been made (e.g. draft EqlA sign off, discussion about consultation response).

### **5.1 Record details of the groups you report to about this policy/ practice/ process/ service and impact assessment.**

Impact assessment provided to SRO to discuss on 14 July, where the early draft was confirmed to be on the right track. Impact assessment also provided to SRO to discuss on 14 August and approved for submission to Performance Framework PB on 24 August. No further comment received from Performance Framework PB.

Executive Team discussed and Chief Executive approved the Equality impact assessment at their meeting on 10 December 2020.



## Step 6 - Post-implementation actions and monitoring impact

There may be further actions or changes planned after the policy/ practice/ process/ service is implemented and this assessment is signed off. It is important to continue to monitor the impact of your policy/ practice/ process/ service on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

**6.1 Record any ongoing actions below.** This can be copied from the project action log or elsewhere in this assessment and should include timescales and person/ team responsible. If there are no outstanding items please make this clear.

None.

**6.2 Note here how you intend to monitor the impact of this policy/ practice/ process/ service on equality groups.** In the table below you should:

- list the relevant measures,
- Identify who or which team is responsible for implementing or monitoring any changes
- Where the measure will be reported to ensure any issues can be acted on as appropriate.

Measure	Lead department/ individual	Reporting (where/ frequency)
Themes from feedback received that is relevant to a protected group	Carol Goater	Executive Team

**6.3 EqIA review date.** This EqIA should be reviewed as part of the wider post-implementation review of the policy/ practice/ process/ service. The date should not exceed 3 years from the policy/ practice/ process/ service implementation date.

26/09/2022

## Step 7 - Assessment sign off



**All equality impact assessments must be signed off by the Executive Team, even where an EqIA is not required.  
Note the relevant meeting date here:**

10/12/2020