



**Councillor Elliot King  
Cabinet Member for Equalities  
and Culture**

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**BY EMAIL**

*Date  
Dyddiad:*

4 January 2022

Summary: This is a letter from the Service Improvement and Finance Scrutiny Performance Panel to the Cabinet Member for Equalities and Culture. The letter concerns the meeting held on 6 December 2022 and the Audit Wales Report – “Making Equality Impact Assessments more than just a tick box exercise”

Dear Councillor King,

On the 6 December, the Service Improvement and Finance Scrutiny Performance Panel met to discuss the Audit Wales Report “Making Equality Impact Assessments more than just a tick box exercise”. The Panel are grateful to you and Rhian Millar, Consultation Coordinator for attending to discuss and answer questions.

We were informed that Equality Impact Assessments (EIAs) have been in place since 2010 and the Council have been carrying them out since 2012. We recognise their importance in tackling inequality and echo the sentiments of the Audit Wales report that they should not become a tick box exercise.

We were made aware that the Council’s EIA process was reviewed last year and as a result the decision was made to create the Integrated Impact Assessment (IIA) to link in with the new social model of equality. We spoke about our awareness and understanding of the challenges Swansea Council faces alongside all public bodies when carrying out EIAs and in particular the lack of resources and absence of clear guidance.

We were pleased to see how monitoring the impacts of policies and decisions is built into the IIA form developed by the Council but queried what the process was on reporting any outcomes. We were informed that the responsibility for monitoring is with the officer responsible for the policy or decision which although understandable due to resources, does mean this monitoring process could be missed and the impact of a policy or decision on protected characteristics may not be monitored after the fact.

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We suggested that if an officer completing the IIA ticks to say there will be no impact they should explain why there isn't an impact, not just explaining the impact when ticking yes. This would help to make sure this question is being answered accurately by officers.

We appreciate the default position that a screening IIA is carried out for all public facing reports and we are aware that some reports are written for information only with no action going forward. We queried whether an IIA screening is required in these circumstances and your officer informed us that this is being looked at internally so we will wait to hear what comes from those discussions.

From our discussion around public reports, we asked about the protocol for non-public reports however we were told that these are much harder to monitor as the Access to Services Team will not ordinarily have sight of these but clear guidance is given to officers that if you're making a change, no matter how small and if it does have an impact then an IIA should be carried out.

Further to this, with the responsibility falling on individual officers to carry out and monitor their IIAs, we asked what awareness officers have of their socioeconomic duties and whether they would understand what a strategic decision is in the context of socioeconomic duty. Your officer informed us that you have run training sessions and there is guidance on the intranet.

In regards to the Consultation and Engagement Strategy we feel that engagement is paramount if we're going to move beyond this being a tick box exercise. We are aware the strategy is out for public consultation and would be keen to see that the impact measurements for this reflects all the protected characteristics when making these assessments and is not just about numbers. We would also encourage consultation within the Council to maximise opportunities to make officers aware of their responsibilities to EIA's.

## **Your Response**

We are interested in any thoughts you may have on the contents of this letter but in this instance, we require no formal written response.

Yours sincerely,



**Councillor Chris Holley**  
**Convener, Service Improvement and Finance Scrutiny Performance Panel**  
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