



Impact Assessment Policy 2021-24

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Date	Created	September 2017		
	Submitted	February 2021		
	Approved	February 2021		
	Updating Frequency	3 years		
Status	Version: 6			
Contributor(s)	Head of Strategy, Information and Governance (SIRO)			
Subject	Impact Assessments			
Type	Policy			
	Vital Record	Yes	ELR	n/a
Coverage	Middlesbrough Council			
Language	English			
Document Control				
Version	Date	Revision History	Reviser	
4.0	May 2014	Revision to include health impact assessments following transfer of public health duties	Ann-Marie Johnstone	
5.0	February 2018	3 year revision	Ann-Marie Johnstone	
6.0	February 2021	3 year Revision	Ann-Marie Johnstone	
Distribution List				
Version	Date	Name/Service area	Action	
3.0	September 2013	All staff via the staff intranet	dissemination	
4.0	May 2014	All staff via the staff intranet	dissemination	
5.0	March 2018	All staff via intranet	dissemination	
6.0	February 2021	All staff via intranet	dissemination	
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Introduction

Impact Assessment (IA) is a continuous process to help decision-makers fully understand and weigh the consequences of possible and actual interventions. In general terms, decisions relating to the following must be considered for impact-assessment:

- new or revised strategies, policies or procedures;
- new or revised services/functions, programmes or projects;
- taking decisions to cease services and/or contracts where they are delivering services that are relevant to the Public Sector Equality Duty; or
- budget reductions or investment proposals impacting on services.¹

IA has multiple legal drivers, notably in relation to the Human Rights Act 1998 and groups protected under UK equality law. A decision that results in *unjustified* adverse impacts on human rights or on those groups or communities of interest protected by law is unacceptable.

The preparation and publication of IAs ensures fairness and transparency in decision-making and enables those with an interest to understand and challenge the rationale for decisions and understand how, and to what extent the decision is likely to impact on them.

This Policy sets out how the Council will undertake IAs to ensure compliance with statutory and best practice requirements and consistency in approach across the organisation.

Statutory drivers

The Public Sector Equality duty, contained in the Equality Act (2010) requires that the Council must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The protected characteristics are:

¹ Please note that the application of policies in individual circumstances is also subject to the equality duty.

- Age
- Disability
- Gender reassignment
- Pregnancy or maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

N.B. There are also certain protections in place for carers and marriage and civil partnerships in relation to the prevention of discrimination.

Non-compliance with this requirement opens the Council to the risk of challenge via the Local Government Ombudsman, judicial review or another process, which could result in the decision being overturned and significant costs and reputational damaged incurred.

The Act provides protection from direct discrimination, indirect discrimination, harassment or victimisation because someone holds one of the protected characteristics. For the purposes of impact assessments it is particularly important to consider whether there could be any unintentional barriers to accessing a service which could result in indirect discrimination. For example placing a service in a building that is not accessible could mean people with a disability could have difficulty accessing services.

The Council has a comprehensive set of report standards that combine with the impact assessment process to ensure that due regard is given not only to the Public Sector Equality Duty but also to wider implications of the decision (such as social, environmental and economic impacts). This enables a full and integrated assessment of the impacts of the decision to be presented to decision-makers and stakeholders². Appendix 2 sets out background and signposts to further information on areas to be considered in impact assessment.

Corporate Impact Assessment process

There are two levels to the Council's IA process:

Level 1: Initial screening assessment

Level 2: Full impact assessment.

Level 1: Initial screening assessment

A Level 1 assessment must be completed where decisions are potentially relevant to the Public Sector Equality Duty (or reviewed/updated if one has been completed previously) for:

- new or revised strategies, policies or procedures;
- new or revised services/functions, programmes or projects; or
- budget reductions or investment proposals impacting on services³.

The Level 1 template is attached at Appendix 3. It represents a simple test to determine whether:

- there will be no negative impacts as a result of the decision; or
- there will be some negative impacts as a result of the decision;

² Environmental Impact Assessment is a specific technical requirement for certain types development consent, and so is not included within this process.

³ The [Equality and Human Rights Commission](#) provides further guidance on the particular issues around impact assessments and their role in financial decisions.

- taking decisions to cease services and/or contracts where they are delivering services that are relevant to the Public Sector Equality Duty (PSED) could have a negative impact; or
- the impacts of the proposed decision are unknown.

In the event that **sufficient evidence** is available to say with certainty that no negative impacts on the areas assessed will result from the implementation of the decision, then the process completes at Level 1. A Level 2 assessment must be completed where it is known that there will be adverse impacts or where the probable impact is uncertain. As the process implies, completion of an IA must be embedded within the policy / decision development process and it should commence when the process is at a formative stage. i.e. the findings of the impact assessment process should shape the development of the proposed policy / decision.

Where the Council shares responsibility for the implementation of the decision, all responsible parties should jointly complete the Level 1 assessment. Where the Council has some involvement in a policy determined elsewhere, then the Council's IA will only be done on the part of the policy performed by the Council.

As an IA progresses, it may become evident that other policies or functions will be affected by proposed changes to the specific area under assessment. In such instances, the full impact of the decision, including knock-on effects for related areas, can be assessed in a single exercise.

The complexity of an IA will be shaped by the extent to which a proposal is relevant to the equality duty and the nature of the proposal. The most complex and contentious IAs are likely to require a significant length of time to compile and analyse the relevant evidence.

Level 2: Full impact assessment

A Level 2 assessment must be undertaken where the Level 1 assessment has identified potential negative impacts or uncertainty around impacts. The purpose of the Level 2 is to ensure the PSED is fully considered. Action must be taken to gather evidence where there is uncertainty around impacts.

If a proposal could have an adverse impact, level 2 must quantify impacts where they were unknown at level 1 and assess whether that impact could be avoided, if it cannot be avoided then can it be mitigated. Finally if it cannot be avoided or mitigated, can it be justified.

Impacts can be either:

None: there will be no change in the outcomes experienced by groups or individuals that hold a particular protected diversity characteristic as a result of the decision.

Positive: will actively promote equality of opportunity for one or more groups or individuals that hold a particular protected diversity characteristic, improve equal opportunities / relations between groups or bring benefits in line with the Councils' agreed strategies.

Negative: will cause disadvantage or exclusion, or hinder the achievement of the Councils' agreed strategies. If such an impact is identified the IA should consider whether it can be avoided. If it cannot be avoided then consideration should be given to mitigating the impact

by minimising it or counter balancing it with other measures. If it cannot be, then the decision can only be taken if there is sound justification for it.

Quality checking

Each completed IA (both Level 1 and 2) must be approved and signed-off by the appropriate Head of Service. It is the author's responsibility to ensure that the completed document meets the required standards of the organisation. The Governance and Information manager can provide advice and guidance on the content of impact assessments.

Reporting

The report seeking approval for the recommended option must outline the findings of the IA in the main body of the report, and attach the IA document(s) as an appendix. Where multiple IAs have been completed, all IAs must be appended to the report.

The IA process is set out in full in the flow chart at Appendix 1.

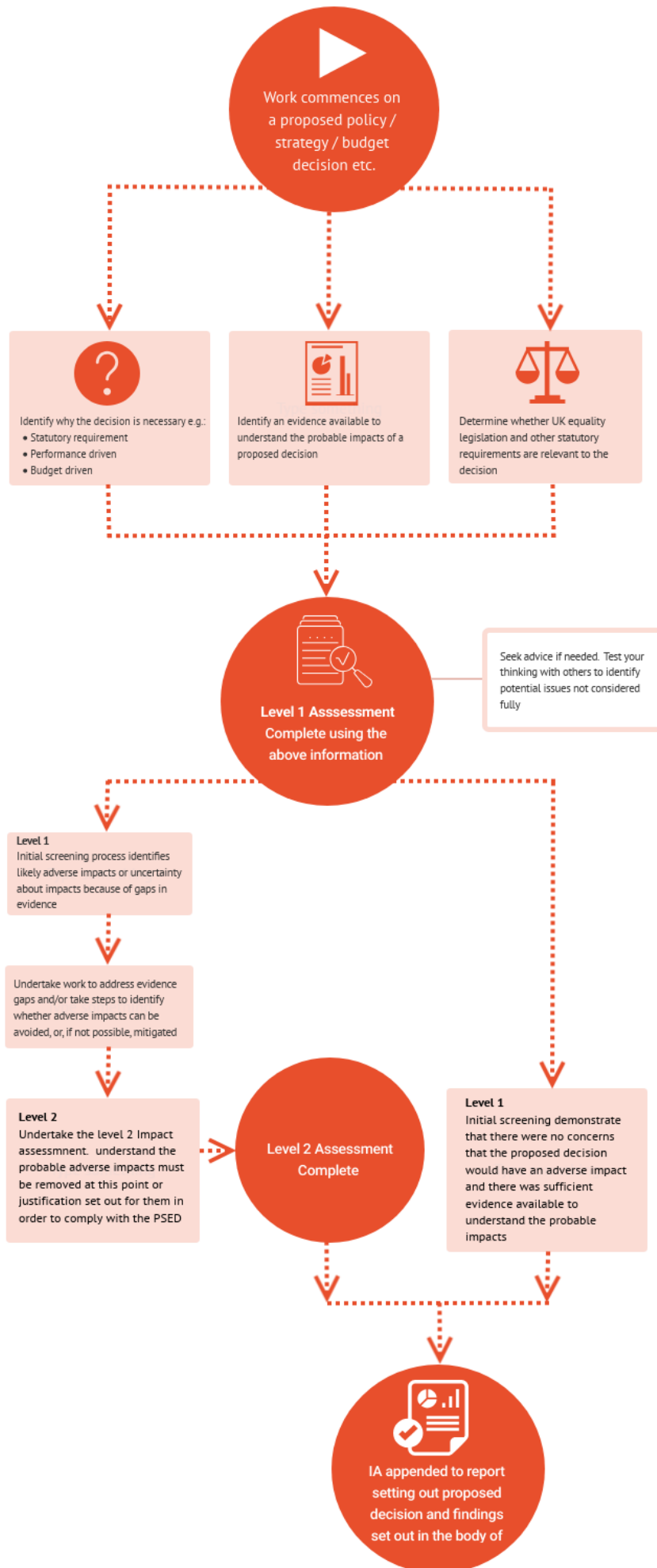
Review

This policy will be reviewed every three years, unless there is case law or new legislation in the interim that means the policy is no longer fit for purpose.

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Appendix 1: Impact Assessment flow chart



Appendix 2: What Needs To Be Considered In Impact Assessments?

1. Human Rights

The Human Rights Act 1998 (in effect from October 2000) makes part of UK law the 16 basic rights contained in the 1951 European Convention on Human Rights and subsequent protocols:

- The right to life (Article 2) *Absolute right*
- The right not to be tortured or treated in an inhuman or degrading way (Article 3) *Absolute right*
- The right to be free from slavery or forced labour (Article 4) *Absolute right*
- The right to liberty (Article 5) *Limited right*
- The right to a fair trial (Article 6) *Limited right*
- The right to no punishment without law (Article 7) *Absolute right*
- The right to respect for private and family life, home and correspondence (Article 8) *Qualified right*
- The right to freedom of thought, conscience and religion (Article 9) *Qualified right*
- The right to freedom of expression (Article 10) *Qualified right*
- The right to freedom of assembly and association (Article 11) *Qualified right*
- The right to marry and found a family (Article 12) *Limited right*
- The right not to be discriminated against in relation to any of the rights contained in the European Convention (Article 14) *Qualified right*
- The right to peaceful enjoyment of possessions (Article 1 of Protocol 1) *Qualified right*
- The right to education (Article 2 of Protocol 1) *Qualified right*
- The right to free elections (Article 3 of Protocol 1) *Qualified right*.

It is unlawful for public authorities to act in a way that is incompatible with a Convention right and anyone who feels that a public authority has acted incompatibly with their Convention rights can raise this before an appropriate UK court or tribunal. Many everyday decisions taken in the workplace are not affected by human rights. Nevertheless, the Council has an obligation to act in accordance with the Convention rights.

Not all the Convention rights operate in the same way. Some are 'absolute' while others are 'limited' or 'qualified' in nature.

Absolute rights: States cannot opt out of these rights under any circumstances – not even during war or public emergency. There is no possible justification for interference with them and they cannot be balanced against any public interest. Examples of absolute rights are the prohibition of torture and inhuman or degrading treatment in Article 3, and the prohibition of slavery in Article 4(1).

Limited rights: These are rights that are not balanced against the rights of others, but which are limited under explicit and finite circumstances. An example is the right to liberty and security in Article 5.

Qualified rights: These are rights that can be interfered with in order to protect the rights of other people or the public interest. Interference with qualified rights may only be justified where the restriction:

- is lawful – this means that it is in accordance with the law, which must be established, accessible and sufficiently clear
- has a legitimate aim – the restriction must pursue a permissible aim as set out in the relevant Article. Public authorities may only rely on the expressly stated legitimate aim when

restricting the right in question. Some of the protected interests are: national security, the protection of health and morals, the prevention of crime, and the protection of the rights of others

- is necessary in a democratic society – the restriction must fulfill a pressing social need and must be proportionate to that need.

The British Institute of Human Rights provides further information: <http://www.bih.org.uk/>.

Public sector guidance is also available from the Ministry of Justice:

<http://www.justice.gov.uk/guidance/humanrights.htm>.

If there is any concern that a decision could contravene the Human Rights Act, advice should be sought from Legal and Democratic Services before proceeding.⁴

2. Equality

The Equality Act 2010 requires that the impact of recommendations is considered as part of the decision making process. Section 149 of the Act requires that the Council must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The characteristics that are protected by the equality duty are:

⁴ This section will be updated as the UK progresses its exit from the European Union to capture any changes that may occur to human rights legislation.

Age	The Act includes specific protections against age discrimination in employment and the provision of services in certain circumstances. Age restrictions may be justified if it is necessary to provide age-appropriate services.
Disability	<p>Equality legislation protects people with a disability from indirect discrimination. Consideration should therefore be given to universal policies that may inadvertently place someone at a disadvantage because of their disability.</p> <p>The Equality Act includes the requirement that reasonable adjustments are made to ensure people are not treated unfavourably because of their disability. The Act makes clear that it is lawful to treat a disabled person more favourably than a non-disabled person as part of steps to ensure they achieve equal outcomes.</p> <p>Impact assessments will focus on considering whether there could be adverse impacts on people with disabilities because of a proposal, whether those impacts would be disproportionate and would also give consideration to treating those with a disability differently to support achievement of equal outcomes.</p> <p>Evidence of the removal or minimisation of barriers and any provisions that have been put in place to support the achievement of equal outcomes should be included within an IA. Barriers to access for people with disabilities could include physical access issues; lack of provision of information in a format that meets; or unnecessary criteria or practices that would put a disabled person at a substantial disadvantage compared to someone without a disability.</p>
Gender reassignment	The Equality Act 2010 provides protections for people undergoing gender reassignment. There have been a number of studies undertaken either at the national level or in other areas of the country, which could be used to inform judgements in the first instance. The numbers of people within the local transgender community are quite small, therefore it is more difficult to gather data on the impact of decisions on this group of people at the local level.
Pregnancy and maternity	The Equality Act 2010 has included some protections for pregnancy and maternity as a diversity characteristic and includes a series of protections from discrimination in both work and non-work cases to protect women who are pregnant or on maternity leave from being treated unfavourably.
Race	Issues that might be relevant when considering the impact of a proposal on race may be whether a group could be disproportionately adversely affected by the proposal because of its location, the nature of the service, its target audience. For example, Ealing Borough Council failed to consider the impact of a proposal to change domestic violence services on the BME community when it decided to close a BME specialist domestic violence service.
Religion or belief	Religion or belief can affect lifestyle in terms of dress, diet and daily observances. Evidence to support the assessment could include sensitivity around these issues where applicable, which could lead to considerations such as the timing of events, food and refreshments provision, uniform requirements etc.
Sex	Non-gender specific services that are predominantly accessed by male or female service users might indicate the existence of barriers. The Equality and Human Rights Commission provides detailed guidance on gender rights. There are a number of data sources containing results that are disaggregated by sex which could be used to support assessments of impact.
Sexual Orientation	Sources of evidence to help make an informed assessment can include customer data if sexual orientation is gathered within equal opportunities forms. Where there are gaps in information, there are a number of advocacy groups (local and national) that could provide sources of evidence. There are also a number of studies that have been undertaken at a national level by both Stonewall and the Equality and Human Rights Commission that may be relevant to the decision.

Failure to assess the impact of a decision against the protected characteristics affected could leave the Council vulnerable to legal challenge.

3. Community cohesion

The duty to ensure community cohesion by “fostering good relations” between different groups or communities of interest by tackling prejudice and promoting understanding is set out within the Equality Act 2010 single equality duty. There is a clear link between equalities and community cohesion, in that people who are unfairly disadvantaged are more likely to feel and express resentment towards other, more advantaged groups.

Community cohesion therefore requires Council services to be sensitive to those issues which could impact adversely on community cohesion. Although issues of race, deprivation, social exclusion and faith remain the more pressing community cohesion priorities in some parts of the country, there are other issues that affect community cohesion including the economy, intergenerational issues, health inequalities, relations between new and indigenous communities, and issues around the treatment of disabled and lesbian, gay, bisexual, and transgender people. Consideration should be given to how integration can be encouraged at all possible levels as well as to what actions may have an adverse impact.

The [Equality and Human Rights Commission](#) provides guidance on how to assess decisions to ensure both the community cohesion and equality duty requirements are reflected.

4. Supporting evidence

A sufficient level of evidence will be required in order to understand the impact of proposal on relevant equality characteristics. Evidence can be quantitative (e.g. statistical data) or qualitative (e.g. service user feedback). When identifying evidence sources consider whether:

- the Council already routinely collects information which can be disaggregated by relevant equality characteristics that could support the completion of an IA
- information is available from other sources e.g. national or regional studies, Equality and Human Rights Commission research etc.

Where there is a lack of evidence steps should be taken to address this within the IA process. Evidence should be provided when assessing the impact of a proposal **and** when assessing the extent to which actions could avoid or mitigate an impact.

5. Sources of support

Contact the Corporate Strategy Team if you have any further advice or guidance requirements.

Template for Impact Assessment Level 1: Initial screening assessment
Appendix 3

Subject of assessment:	Insert title			
Coverage:	State the extent or scope e.g. overarching/crosscutting or service-specific.			
This is a decision relating to:	<input type="checkbox"/> Strategy	<input type="checkbox"/> Policy	<input type="checkbox"/> Service	<input type="checkbox"/> Function
	<input type="checkbox"/> Process/procedure	<input type="checkbox"/> Programme	<input type="checkbox"/> Project	<input type="checkbox"/> Review
	<input type="checkbox"/> Organisational change		<input type="checkbox"/> Other (please state)	
It is a:	New approach:	<input type="checkbox"/>	Revision of an existing approach:	<input type="checkbox"/>
It is driven by:	Legislation:	<input type="checkbox"/>	Local or corporate requirements:	<input type="checkbox"/>
Description:	Insert short description, using the following as sub-headings: <ul style="list-style-type: none"> • Key aims, objectives and activities • Statutory drivers (set out exact reference) • Differences from any previous approach • Key stakeholders and intended beneficiaries (internal and external as appropriate) • Intended outcomes. 			
Live date:	When will this be implemented?			
Lifespan:	Between which dates will this apply?			
Date of next review:	When will the next review be undertaken? State any triggers for early review.			

Screening questions	Response			Evidence
	No	Yes	Uncertain	
Human Rights Could the decision impact negatively on individual Human Rights as enshrined in UK legislation?*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outline the evidence supporting the assessment.
Equality Could the decision result in adverse differential impacts on groups or individuals with characteristics protected in UK equality law? Could the decision impact differently on other commonly disadvantaged groups?*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outline the evidence supporting the assessment.
Community cohesion Could the decision impact negatively on relationships between different groups, communities of interest or neighbourhoods within the town?*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Outline the evidence supporting the assessment.
Next steps: ➡ If the answer to all of the above screening questions is No then the process is completed. ➡ If the answer of any of the questions is Yes or Uncertain, then a Level 2 Full Impact Assessment must be completed.				

Assessment completed by:		Head of Service:	
Date:		Date:	

* Consult the Impact Assessment further guidance appendix for details on the issues covered by each of these broad questions prior to completion.

Template for Impact Assessment Level 2: Full impact assessment

Appendix 4

Subject of assessment:	Insert title			
Coverage:	State the extent or scope e.g. overarching/crosscutting or service-specific.			
This is a decision relating to:	<input type="checkbox"/> Strategy	<input type="checkbox"/> Policy	<input type="checkbox"/> Service	<input type="checkbox"/> Function
	<input type="checkbox"/> Process/procedure	<input type="checkbox"/> Programme	<input type="checkbox"/> Project	<input type="checkbox"/> Review
	<input type="checkbox"/> Organisational change	<input type="checkbox"/> Other (please state)		
It is a:	New approach:	<input type="checkbox"/>	Revision of an existing approach:	<input type="checkbox"/>
It is driven by:	Legislation:	<input type="checkbox"/>	Local or corporate requirements:	<input type="checkbox"/>
Description:	Insert short description, using the following as sub-headings: <ul style="list-style-type: none"> • Key aims, objectives and activities • Statutory drivers (set out exact reference) • Differences from any previous approach • Key stakeholders and intended beneficiaries (internal and external) • Intended outcomes. 			
Live date:	When will this be implemented?			
Lifespan:	Between which dates will this apply?			
Date of next review:	When will the next review be undertaken? State any triggers for early review.			

Assessment issue	Impacts identified					Rationale and supporting evidence
	None	Positive	Negative		Uncertain	
			Justified	Mitigated		
Human Rights						
Engagement with Convention Rights (as set out in section 1, appendix 2 of the Impact Assessment Policy).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Equality						
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles. NB the following cells can be merged as appropriate.
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Pregnancy / maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Marriage / civil partnership**	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Dependants / caring responsibilities**	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Criminal record / offending past**	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.

** Indicates this is not included within the single equality duty placed upon public authorities by the Equality Act. See guidance for further details.

Assessment issue	Impacts identified					Rationale and supporting evidence
	None	Positive	Negative		Uncertain	
			Justified	Mitigated		
Community cohesion						
Individual communities / neighbourhoods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.
Relations between communities / neighbourhoods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Explanatory text. Outline the evidence supporting the assessment. Do not simply quote research or report titles.

Next steps:

- If the answer to some questions remains Uncertain, then further work must be undertaken to clarify impacts. Repeat the process until there is certainty, but ensure that the amount of work undertaken is proportionate to the decision required. No relevant report should be submitted for approval until there is a satisfactory level of certainty around the impacts of the recommended decision.
- Be sure that any likely differential impacts identified through the process (positive or negative) are well evidenced and clearly marked in the template.
- Where the impact is negative, be clear that this can be justified with the justification outlined. If it cannot, the recommended decision must be reviewed.
- Where negative impacts are unjustified and *unavoidable*, actions must be put in place to remove or mitigate impacts. These should be listed in the action plan below.
- The results of the IA process (including changes made to the proposed approach and further actions) should be outlined the main body of the report, and the completed IA template appended to that report.

In addition to the above the report author may also wish to consider completing a discretionary Health impact assessment. Guidance on when this is appropriate should be sought from the Public Health team.

Further actions		Lead	Deadline
Mitigating actions	Identify actions in place or to be undertaken to mitigate impacts identified. Sufficient evidence must be provided to demonstrate to the decision maker that the impact will be mitigated by these actions.		
Promotion	Outline how the decision and its impacts will be publicised both internally and externally as applicable.		
Monitoring and evaluation	Outline how the implementation of the decision will be monitored and evaluated to identify any areas of unexpected negative impact.		

Assessment completed by:		Head of Service:	
Date:		Date:	

