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	Authorised by: Jennifer Russell	

It is important to note that not all policy, strategy or projects will require a full impact assessment to be carried out. In order to ascertain whether this is required or not please ensure that you have carried out an Initial Equality Impact Assessment. The following table provides further details on each of the protected characteristics and definitions of each strand.

Protected characteristic	Definition
Age	Protects people of all ages
Disability	Applies to a range of people that have a condition (physical or mental) which has a significant and long-term adverse effect on their ability to carry out 'normal' day-to-day activities. This protection also applies to people that have been diagnosed with a progressive illness such as HIV or cancer
Gender	Applies to male or female
Gender Reassignment	The definition of gender reassignment includes people who chose to live in the opposite gender to the gender assigned to them at birth removing the previously legal requirement for them to undergo medical supervision
Marriage or civil partnership (HR projects only)	The Act protects employees who are married or in a civil partnership against discrimination. Single people are not protected
Sexual Orientation	The Act protects lesbian, gay, bi-sexual and heterosexual people
Race	This includes colour, ethnic / national origin or nationality
Religion or Belief	The Act covers any religion, religious or non-religious beliefs. Also includes philosophical belief or non-belief
Pregnancy and Maternity	A woman is protected against discrimination on the grounds of pregnancy and maternity. With regard to employment, the woman is protected during the period of her pregnancy and any statutory maternity leave to which she is entitled

Revision History			
Revision	**Description**	**Author**	**Effective Date**
0.1	Draft copy for review	Sam Mutters	17 September 2013
0.2	Changes made from Carol Gillespie	Sam Mutters	18 September 2013

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0.3	Changes made following BW Team meeting	Sam Mutters	01 October 2013
0.4	Changes made from Ruth Stidson, Equalities Champion	Sam Mutters	23 October 2013
1.0	Agreed document	Sam Mutters	25 October 2013
1.1	*Subsequent changes to document*		

Name of Business Unit	Programme Management Office – Bathing Waters
Name/designation of person(s) responsible for managing/ conducting this policy, strategy or projects	Sam Mutters, Environmental Systems Project Manager
Have you carried out an Initial Equality Impact Assessment?	Yes

Name of Policy, Strategy or Project	Bathing Waters Work stream Improving Bathing Waters Systems for the European Water Framework Directive.	
Is it (*delete as applicable)	*New	
Is responsibility for delivery shared with others? (*delete as applicable)		*Yes potentially
If yes, who are your partners?	Met Office and other Organisations who wish to use the signs for messages i.e. Local Authorities. SEPA also have a supplier of the sign and an Agent.	

Which of the following equality areas are relevant to this policy, strategy or projects?			
Age	Yes	Sexual Orientation	No
Disability	Yes	Race	Yes
Gender	No	Religion or Belief	No

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Gender Reassignment	No	Pregnancy and Maternity (HR projects only)	No
Marriage or Civil Partnership (HR projects only)	No		

Start Date	July 2013	Completion Date	28th October 2013
Approved by	Calum McPhail (Senior User)	Date Approved	
Date sent to: equalities@sepa.org.uk	28th October 2013	Signed:	
Date the Equality Impact Assessment was published		Signed:	

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1.   Identify ALL the Aims of the policy, strategy or projects

> 1.   What is the purpose of the policy, strategy or projects? (consider explicit and implicit aims)
>
> 2.   Who does the policy, strategy or projects affect?
>
> 3.   Who does the policy, strategy or projects benefit directly? (e.g. employees/service users; equality groups, other stakeholders)
>
> 4.   What results/outcomes are intended?

1. The primary purpose of the Bathing Waters work stream is:

• 	To make changes so that SEPA comply with the Water Framework Directive for the 2015 bathing season.

• 	SEPA are taking the opportunity to improve the systems including updating the existing bathing water signs at the beaches.

2. Publication of the data on SEPA's website will affect several groups:

• 	SEPA staff – all staff may refer to the data

• 	Casual Technical Users i.e. Customers outside of SEPA with a basic knowledge and interest in environmental issues in Scotland.

• 	External Bodies and interested parties.

• 	Members of the Public

• 	Public Organisations (i.e. Local Authorities)

• 	Scottish Government

3. The creation and publishing of Bathing Waters data will directly benefit:

• 	SEPA staff – staff may refer to the data i.e contaminated land, Marine staff, RBMP, Hydrology & Flood Duty Officers, Water abstraction team and IS staff.

• 	Casual Technical Users i.e. customers outside of SEPA with a basic knowledge and interest in environmental issues in Scotland.

• 	Members of the Public

• 	Public Organisations (i.e. Local Authorities)

• 	Scottish Government

• 	Europe

4. The intended outcomes are:

• 	Meet SEPA's statutory obligations under the Bathing Waters Directive.

• 	Provide data for areas of work under SEPA's control & remit.

• 	Help to provide a full Scottish picture of the environment.

2.   Consider the Evidence (data and information)

> 1.   What information or data would it be useful to have? What data (quantitative and qualitative) is available? (in-house/external)

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2.   How reliable/valid/up-to-date is it?

3.   What information is available?

4.   What does the data/information tell you about

- Different needs?
- Different experiences?
- Different access to services, information or opportunities?
- Different impacts/different outcomes?

5.   Are there any gaps that you should fill now/later by further evidence gathering/commissioning or by secondary analysis of existing data? Are there any experts or stakeholders you should consult now? Have you consulted any experts already? What were their views?

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1. The Equalities mainstream report, April 2013 states that there are 23 staff members who have a disability. This equates to 1.34%. Within Scotland there are 20% of the population who are registered as Disabled. There are likely to be many disabilities not only being blind.
2. This information is the most up-to-date information SEPA currently holds as it has been taken from this year's Equalities mainstream report. No other information is currently available.
3. As above. Also see Appendix 3, P.27 of mainstream report which has a list of evidence.
4. The needs of a blind, partly sighted or colour blind person will all be different. They may also vary from person to person. As an Equality outcome, SEPA want to improve accessibility of our communications (including our website), specifically in relation to the protected characteristic of disability, race and age.
5. At this time there do not appear to be any gaps

Costs for converting information into Braille and a supplier are being currently looked into. This links into communications which is being pursued by SEPA's communications team. This will need to be proportionate to the needs of our Customers.

Further information about Blind people in the workplace can be found here:
http://www.rnib.org.uk/livingwithsightloss/Documents/This_IS_Working_2.doc

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3.   Assess the likely impact on different groups

1.   Does your analysis of the evidence indicate any possible adverse impact on a particular group (age, disability, gender, transgender, sexual orientation, race, religion or belief, pregnancy or maternity and marriage or civil partnership)

2.   If it is adverse, is it likely to be discriminatory?

3.   In what areas does it have an impact? E.g. access to information, experience of services.

4.   Even if there is no evidence of adverse impact, is there an opportunity to promote equality more effectively, or foster good relations between groups.

1. The Initial Equalities Impact Assessment has identified a possible adverse impact on the Disability, Race and Age.

2. The impact on some members of the identified protected groups may be discriminatory as if a user is unable to access and view the SEPA website they will be excluded from viewing the information published.

3. Publishing the information will exclude some members of the groups identified above from being able to access the published information. For example some users who fall under the Disability protected characteristic may be unable to access the data if they are colour-blind, partially sighted or blind. Some people may not be able to understand the language and so this is why it is felt this would affect the Race protected characteristic group too. Elderly people may have less access to computers.

4. There has been no direct opportunity to promote equality or foster good relations between groups identified by the publication of this information, however opportunities will be considered.

4.   Consider alternatives (what to do if you find adverse impact)

1.   How can you change your proposal in a way that is proportionate, and will

•   Remove discrimination?

•   Reduce any adverse impact?

•   Promote equality more effectively?

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- Foster good relations between groups?

2. If there are none, can the policy, strategy or projects still be justified?

3. Can the aims be met in some other way? What can you do now/later?

4. What are you recommending?

---

1. The proposal is being reviewed and if any specific requirements are needed these will be captured in the specification. This will enable those who are unable to access the internet to receive the information that they request in a different format on request i.e Braille or Language etc.

2. As detailed above other means to allow access to the published information will be identified, the original proposal will be launched in tandem with these other methods

3. As above the aim of providing/ publishing data will be met using several methods to promote equality.

4. The recommendation is that the data is to be published on the SEPA website as originally proposed and supplemented with other processes which will allow access to the published information through other means, e.g. if someone wishes to receive information in Braille then they will be able to contact SEPA and request that. SEPA need to think of others ways that we can supply data to people in the first place i.e. how people will know that there is information on the website if they can't read. SEPA already have a phone line in place for the bathing water. This will be looked at along with the signs to see what further improvements can be made. These will need to be proportionate.

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5.   Consult formally (relevant stakeholders)

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1.   What are the views of the people who are likely to be affected or who have an interest about?

- Whether you have identified the right issues?

- Whether you have proposed suitable modifications?

- Whether your proposals will meet their needs?

2.   How will you consult?

3.   Whom do you need to get views from?(internally/externally)

4.   What methods will you use?

5.   What formats will you use for communicating with different groups?

---

1. Issues have been identified and solutions proposed based on knowledge of equalities from SEPA staff, a training course on equalities legislation and previous experience of similar products on SEPA's website.

2. Consultation will be with stakeholders internal to SEPA through Senior User, Project Control Board and Team meetings. SEPA will also consult with External Stakeholders including interested Organisations who are interested in the data that SEPA are publishing under the Water Framework Directive. This will be at a range of meetings.

3. SEPA will talk with the Project Team and Senior User as well as with the ESPCB and Equalities Champion. SEPA have also discussed the EqIA with the Equalities Champion and Champion Group. SEPA may need to discuss with the supplier of the sign other ways of promoting the message – i.e. voice activated potentially by pressing a button.
Externally SEPA will consult with Keep Scotland Beautiful and other key stakeholders through the Bathing Waters review panel.

4. SEPA's main method of consultation will be to seek verbal and written feedback on progress at every opportunity.

5. Formats - SEPA will use a range of electronic and paper formats, intercall, meetings and other formats requested.

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6.   Decide whether to adopt this policy, strategy or project- (consider these questions to prompt answers)

> What were your findings from the consultation?
>
> Taking into account all of the data, information, potential impact issues and consultation feedback, what will you recommend?
>
> - Stop and remove the policy, strategy or project
>
> - No major change the policy, strategy or project is robust
>
> - Modify the policy, strategy or project (Say how your changes will deal with adverse impacts) (consider if there are any new adverse impacts for any equality group)
>
> - Adopt the policy, strategy or project as proposed. (You should justify this where you identified adverse impact, or where you are not incorporating feedback from your consultations)

> The full EqIA was discussed at the Bathing Waters meeting on 27th September 2013.
>
> It was agreed that there shall be no major changes to this project. SEPA will continue to monitor this throughout the project lifecycle.
>
> This information is primarily only of use to people who want to go swimming in the sea. Of course, there are many older people and disabled people who do swim in the sea, but this information will be of less use to the very elderly / vulnerable who are unlikely to go swimming.
>
> There is already a phone line in place currently. This is will be reviewed and it is likely to be kept in order for people to access the information through that format.

7.   Make Monitoring (and review) Arrangements - (consider these questions to prompt answers)

> 1.   How will you know what the actual effect of the policy, strategy or project is?
>
> 2.   In what ways will you monitor? e.g. continuously or irregularly, quantitative methods such as surveys, qualitative methods such as interviews
>
> 3.   How often will monitoring information be analysed (and published)?
>
> 4.   When will you review the policy, strategy or project taking into account any monitoring

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information?

1. SEPA will be able to assess the effectiveness of the project by assessing enquiry numbers.
2. The Senior User & Line Managers of SEPA staff will be responsible for undertaking monitoring. This may include a survey or could be informal discussion with staff.
3. Monitoring information will be published annually but not exclusively for this product.
4. This will be reviewed on an annual basis whilst the project is within the PMO. The benefits realisation plan and project closedown report will make recommendations to the Business.