

Integrated Impact Assessment Policy

Version Control

Version Number	UEB Sponsor	Approval Body/Officer	Date of approval
V_03	Chief Operating Officer & University Secretary	UEB	08/10/2024

Published in line with the requirements of the Welsh Language Standards (No.6) Regulations 2017 and the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

This document is available in Welsh.

1. PURPOSE

- 1.1. The purpose of the Integrated Impact Assessment Policy is to clarify the requirements under the Welsh Language Standards (No.6) Regulations 2017, Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, and the Equality Act 2010, and set out the structures and processes within which compliance will be facilitated.
- 1.2. This policy clarifies the requirement for the University to complete Integrated Impact Assessments (IIA) on relevant decision-making activities, to facilitate compliance with the regulations and legislation.
- 1.3. An IIA is a tool to help make better decisions and is to be used in a proportionate way to support decision making. If impact is not assessed, then the University is open to legal challenge, and failure to ensure an audit trail is in place to evidence compliance with the legislation/regulations.
- 1.4. This policy also introduces the requirement for a triage tool to be completed to help guide staff and decision makers to know when an impact assessment needs to be completed.
- 1.5. Integrated Impact Assessments will replace the Equality Impact Assessment framework and process.

2. SCOPE

- 2.1. The legal duties are set out in Appendix A.

- 2.2. Guidance on what constitutes a policy or practice, which would require an IIA, can be found [here](#). Please contact Complianceandrisk@cardiff.ac.uk if unsure.
- 2.3. Policies or practices that have the potential to impact on people will be in scope of this policy. This includes decisions about whether to remove or end a policy, procedure, project, strategy, service or function.
- 2.4. If there isn't an existing policy that governs the decision being considered, then it is likely to be a policy decision that requires an impact assessment.

3. POLICY

- 3.1. At the initial concept stage an IIA [Triage Form](#) must be completed to determine whether an IIA needs to be undertaken. Where an IIA is not required, informal considerations should be made and a record of these considerations and adaptations recorded in the triage form.
- 3.2. The Compliance and Risk Team will also review the triage forms and provide additional advice where necessary.
- 3.3. If deemed necessary by the triage form, a full IIA must be started during the initial conception stage of the policy to help inform the development process. This should be undertaken by someone who is involved in the policy, procedure, project, strategy, service or function.
- 3.4. The time and effort put into the IIA should be proportionate to the decision being made. It may not be necessary to conduct an IIA on individual elements of work being delivered to implement a policy/activity. For example, we would not use an IIA to decide if a recruitment/selection policy was discriminating against one person, but we would use it to design an inclusive recruitment/selection policy from the outset, or to review and update an existing policy. The number of people that will be affected, and the intended impact of the work should be considered when deciding whether to conduct an IIA.
- 3.5. The greater the potential adverse impact of the proposed service, policy, strategy, practice, or plan on a protected group and/or the more vulnerable the group in the context being considered, the more thorough and demanding the process of an IIA required by the legislation will be.
- 3.6. An IIA at Cardiff University will:
 - identify any effect on the Welsh language (positive, negative, no impact or a combination)
 - note ways of promoting the Welsh language, including the use of Welsh
 - reduce any adverse effects on the Welsh language
 - evidence conscientious consideration of the impact on the Welsh language

- identify any effect on those with specific protected characteristics (positive, negative, no impact or a combination)
- take steps to remove or mitigate adverse effects on those with a protected characteristic.
If adverse effects are unavoidable, the IIA must show that the University has properly considered the reasons for proceeding with a decision despite the impact and have clear evidence that the decision was proportionate and lawful in the context of advancing equality overall.
- provide an opportunity to highlight the potential for positive impact of what we do
- demonstrate that the university has given due regard to the general duty to eliminate discrimination/promote equality of opportunity and good relations.

Guidance is available here: [IIA Procedure – Guidance for staff](#), which provides an overview of how the University will embed IIAs into its decision making.

- 3.7. Completed IIAs must accompany proposal papers to ensure compliance with the legal requirement under the Public Sector Equality Duty (Wales), and Welsh Language Standards (No.6) Regulations 2017 to carry out and document an Impact Assessment. This process should take place at the discussion and development stage to ensure it is a genuine part of decision-making. Decision makers must review the IIA before making their final decision. Once completed, the IIA must also be forwarded to the Compliance & Risk team at Complianceandrisk@cardiff.ac.uk.
- 3.8. All decisions need to consider Welsh language and equality impacts in a way which is proportionate to the decision being made.
- 3.9. Decision makers (including Council/Senate/the Executive (UEB)/College Board/and Senior Staff through delegated decisions) will act as ‘gatekeepers’, ensuring that Welsh language and equality impact is summarised on committee paper cover sheets and the full impact assessment is submitted alongside the cover sheet to demonstrate compliance and inform discussion.

4. ROLES AND RESPONSIBILITIES

- 4.1. The Chief Operating Officer and University Secretary is the University Executive Board Sponsor for this policy.
- 4.2. The Senior Compliance Advisor and Welsh Language Officer from the Compliance and Risk Team (University Secretary’s Office) is the policy owner.
- 4.3. Owners of proposals are responsible for ensuring that an IIA has been completed where applicable and presented for approval in accordance with this policy. For other decisions, each College PVC, Head of School, Director, Research Institute, Professional Service Head, and the University Executive Board shall be

responsible for ensuring their respective area complies with the requirements of this policy.

- 4.4. The Chief Operating Officer and University Secretary shall ensure that such steps as appropriate (including training) have been taken to ensure that senior leaders are aware of the requirements and the implications of this policy and require them to disseminate information to staff involved with policy decision making in their respective areas.

5. RELATED POLICIES

- 5.1. This policy forms part of a wider advice framework relating to the Welsh language and Equality, Diversity and Inclusion which supports compliance with the Welsh Language Standards (No.6) Regulations 2017, Equality Act (2010) and the Public Sector Equality Duty.
- 5.2. It should be read in conjunction with
 - The Integrated Impact Assessment Tool
 - The Integrated Impact Assessment Procedure – Guidance for staff
 - The Integrated Impact Assessment Triage Form
- 5.3. It also has a relationship with other University policies, specifically:
 - Welsh Language Service Delivery Policy
 - Awarding Grants and Financial Assistance – Welsh Language Considerations Policy and Procedure
 - Internal Use of Welsh Policy.
 - Equity, Diversity and Inclusion Policy

These policies can be found on the intranet.

6. QUERIES

- 6.1. For any questions or queries regarding this policy and procedure please contact the Compliance and Risk team via email – compliancandrisk@cardiff.ac.uk.

7. MONITORING AND REVIEW

- 7.1. This policy will be informally reviewed on an annual basis by the Policy Owner and formally every 3 years.
- 7.2. The Compliance and Risk team will monitor the use of the IIA tool by assessing the number of policies submitted to UEB that include an IIA. Where gaps are identified, departments will be contacted directly to offer training and support to

increase awareness and compliance with the requirements.

7.3. Where trends are apparent, these will be highlighted to PSB/CRG for discussion.

8. VERSION CONTROL INFORMATION

Document Name	Integrated Impact Assessment Policy
UEB Policy Sponsor	Chief Operating Officer and University Secretary
Policy Owner	Senior Compliance Advisor and Welsh Language Officer
Policy Author(s)	Thomas Tudor Jones, Senior Compliance Advisor and Welsh Language Officer, Compliance and Risk Team, University Secretary's Office
Version Number	V0_4
Equality and Welsh Language Impact Assessment Date	January 2024
Privacy Impact Assessment Date (where applicable)	N/A
Approval Date	08/10/2024
Approved By	UEB
Date of Implementation	October 2024
Date of Last Review	October 2024
Date for Next Review	October 2027

Change History Record

The table below should be completed by the Author each time a change is made to the policy

Version amended and date of review	Reviewer(s)	Description of Change	Version created
V_01 May 2021	Thomas Tudor Jones	A comprehensive review was completed following audit recommendations, with a focus on increasing understanding of the exact Welsh language standards. This was done to improve compliance based on feedback from the regulator.	Integrated Impact Assessment Policy V_01

Appendix A – The Legal Duties

Welsh Language

Welsh Language Standards 94, 95 and 96 require Cardiff University to ensure;

- the person making, reviewing or revising a policy decision considers what effects, if any (whether positive or adverse), the policy decision would have on –
 - opportunities for persons to use the Welsh language, or
 - treating the Welsh language, no less favourably than the English language
- the person making, reviewing or revising a policy decision considers how the decision might be made so that the decision has positive, or increased positive effects –
 - opportunities for persons to use the Welsh language, or
 - treating the Welsh language no less favourably than the English language
- the person making, reviewing or revising a policy decision considers how the decision might be made so that the decision does not have adverse effects, or so that the decision has decreased adverse effects –
 - opportunities for persons to use the Welsh language, or
 - treating the Welsh language no less favourably than the English language

An Integrated Impact Assessment (IIA) will enable decision-makers to consider the impact, mitigations that may reduce any negative impacts, or interventions that may increase positive impacts on the following key areas, in line with the requirements of the Welsh Language Standards (No.6) Regulations 2017 -

- **opportunities to promote the Welsh language**
e.g. the status of the Welsh language, use of Welsh language services, use and awareness of Welsh in everyday life in work, on campus and in the community, visibility of the Welsh language and opportunities to learn Welsh or develop Welsh language skills.
- **opportunities for persons to use the Welsh language**
e.g. Encouraging the growth of current skills or use by Welsh speaking members of our community, including Welsh language learners and promoting more use of our Welsh language services and social use of Welsh, including use of Welsh via digital technologies, from staff, students, prospective students, and visitors.
- **numbers and / or percentages of Welsh speakers**
e.g. social, economic and cultural infrastructure of Welsh speaking communities, transmission of Welsh and efforts to protect and promote the Welsh language. Welsh Medium Education / Study Opportunities. Links with the Welsh Government's Cymraeg 2050 Strategy / Cardiff University's Welsh Language Strategy - Yr Alwad.

- **compliance with the University's statutory Welsh Language Standards**
e.g. increasing the University's ability to deliver services through the medium of Welsh.
- **treating the Welsh language no less favourably than the English language**

Equality

The Equality Act requires the University 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.

To demonstrate that it has given 'due regard' to the potential impact of its policies, processes and decisions on the 'protected characteristics' identified under the Equality Act 2010, the university must complete an assessment of impact, which forms part of our Integrated Impact Assessment (IIA) at Cardiff University, in respect of a change of function, policy or practice.

Under the Equality Act 2010 the protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (in employment) race, religion or belief, sex, sexual orientation.

An IIA will enable decision-makers to consider the following in relation to the Equality Act and Public Sector Equality Duty (PSED)

- Is there any direct discrimination?
- Is there any potential for indirect discrimination?
- What are the potential adverse impacts on those with protected characteristics and how will they be addressed
- How we can advance inclusivity and show fairness in our activities and demonstrate that our decisions are considered, fair, and transparent, reinforcing our value and commitment to equality, diversity, and inclusion.

Under the Specific Duties for Wales of the Equality Act 2010, arrangements must be made to publish reports where the assessment shows that there is likely to be a substantial impact on an authority's ability to comply with the general duty.