



**Reference:** 606A2016

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## Report on Equality Impact Assessment – the Auditor General’s and the Wales Audit Office’s Reasonable Adjustments Policy (External)

1 In accordance with Regulation 8 of the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, the Auditor General and the Wales Audit Office have made arrangements for assessing the likely impact of their proposed policies and practices on their ability to comply with the general equality duty, monitoring such impacts and publishing reports on such assessments. This report is made in accordance with those arrangements.

### The purpose of the policy

- 2 The primary aim of the [Reasonable Adjustments Policy](#) is to help ensure that the organisation takes reasonable steps to avoid any of our practices placing people with impairments at a substantial disadvantage because of their impairments. In other words, it is to ensure that the Auditor General and the Wales Audit Office fulfil their duties to make reasonable adjustments under section 20 of the Equality Act 2010. It is intended to benefit people with impairments.
- 3 The policy also recognises that we have responsibilities to comply with the general equality duty (section 149 of the 2010 act). That duty requires us to have due regard to the need to eliminate discrimination, promote equality of opportunity and to foster good relations. It is therefore appropriate that we consider requests from people with a protected characteristic (other than disability) for changes to ways that we work that may be causing them disadvantage.
- 4 The policy must be adhered to by all who work in, or for, the Wales Audit Office (including contractors) in their dealings with members and employees of audited bodies and other organisations, and in dealings with members of the public.
- 5 The Wales Audit Office has a separate policy in place for Wales Audit Office employment matters relating to reasonable adjustments.

## Summary of the steps taken to carry out the assessment, including information taken into account

- 6 The main steps taken to carry out the assessment are:
- engagement with persons representing the interests of persons with protected characteristics so as to inform the subsequent steps;
  - consideration of relevance of the policy to the general equality duty and, where relevant, of the likely impact of the policy on the Auditor General and Wales Audit Office's ability to comply with that duty;
  - consideration of the known or likely impact of the policy on groups of persons with protected characteristics;
  - consideration of what further information should be collected to inform the impact assessment and to allow ongoing monitoring; and
  - consideration of what action or decision should be taken as a result of the assessment, in particular modification or cessation of implementation of the policy.

## Results of the assessment and decisions taken in relation to the results

### Engagement

- 7 We engaged with the Wales Council for Voluntary Action and forwarded via their coordinator the draft policy to all representative focus groups included in the council's membership. We did not receive any feedback or comments on the draft policy. We also engaged with Scope Wales, and we are grateful for their comments and have taken them into account in developing the policy.
- 8 We also engaged on an early draft of the policy with the internal Wales Audit Office Equality Interest Group (EIG) who represent the interests of Wales Audit Office staff with protected characteristics. The EIG has commented on and approved the content of the policy.

### Relevance of the policy to the general equality duty

- 9 The Reasonable Adjustments Policy is particularly relevant in helping us to eliminate any indirect discrimination that persons with an impairment may face arising from the way we carry out our work; for example, adjustments could include providing additional time for interviews in order to help people to understand the questions being put to them.
- 10 By also having due regard to the general duty in dealing with any requests for reasonable adjustments that we receive, this policy should also help eliminate any indirect discrimination faced by persons with other protected characteristics, not just those with impairments.
- 11 The policy's intended effect of reducing disadvantage should advance equality of opportunity. Furthermore, by addressing disadvantages faced by people with impairments and other protected characteristics the policy should be conducive to better communication and increased participation in processes connected to holding public bodies to account (such as objections at audit), thereby enabling greater contact and understanding. It should therefore be conducive to fostering good relations. And in that regards, the policy states that the Wales Audit Office should not assume that adjustments are needed; each case should be assessed individually. This will reduce the potential for offence to be caused, and promote respect.

### Likely impact

- 12 The policy is potentially relevant to any persons with protected characteristics, but it is clearly of greatest relevance to people with impairment (disability). It is also fairly likely to be of relevance to older people. The intended impacts are reduction in disadvantage faced, so helping to eliminate discrimination, advancing equality of opportunity and fostering good relations, as noted above. As yet, we have no direct evidence of actual impact because while some informal adjustments have been made from time to time, no system for determining and monitoring adjustments and their impacts is yet in place. We do not foresee the policy as having any discriminatory effect.

## Further information and monitoring

- 13 The policy provides for the collection of information on adjustments requested and the responses made. It also makes provision to help ensure that relevant complaints are captured. The collection and monitoring of this information will help ensure the policy's effectiveness. It should also help us to identify wider steps to improve our operations.

## Action or decisions to be taken as a result of the assessment

- 14 It is clear that the policy should be implemented without delay. There is no identified need for further modification. It is also clear that the Wales Audit Office's Equality Manager (or Law & Ethics Manager) will need to review the monitoring information annually, but it is probably not helpful to build this requirement into the public-facing policy, as it will make it longer and harder to read.

**Martin Peters**

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**23 July 2015**