

I have recently reviewed the changes to the draft PSEDs and would like to offer my wholehearted support to the intention of reducing bureaucracy in the delivery of our commitments and duties in relation to these issues.

I have worked in E&D for 10 years now and was involved in the development of the very first Equality Schemes and Impact Assessment structures and I can honestly say that across the 4 different organisations and sectors I have worked in over this time I have never been able to develop a pragmatic, simple, meaningful and effective Impact Assessment system that didn't involve a ridiculous amount of expenditure of both time and money in gaining a few snippets of information that the professionals in the area could not have come up with if given the correct prompts. Or a system that hasn't just turned into a tick box exercise that is a waste of time and paper.

I appreciate the proposed changes to the PSEDs have caught the EHRC off guard in that their guides were developed on the back of the January proposals however I have significant concerns that their guide on equality analysis does nothing for the cause of reducing bureaucracy when you read it in detail. If you truly wish to remove the 'process' imperative from the legislation and focus on outcomes you need to ensure we as practitioners are unshackled from the chains of this paper recording exercise whether or not you call it Equality Analysis or Impact Assessment. I appreciate the new PSEDs remove the need to publish the detail of the analysis but if the guide from EHCR is retained in its present format we will still be pushed into having prolonged and protracted documented processes which will be demanded at every turn by unions and at ETs.

My preference would be for a management commentary against each characteristic detailing what equality impact, considerations and outcomes have been accounted for in the development & deployment of the policy.

Take care,

Kathy

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