

CUNNINGHAME HOUSING ASSOCIATION LTD

EQUALITY IMPACT ASSESSMENT FORM

1. Information	
Document/Policy/ Strategy being created or updated	Freedom of Information (Scotland) Act Policy
Purpose of creation or update / Executive Summary:	This policy outlines how the Association complies with the Freedom of Information (Scotland) Act 2002, including duties to publish information, respond to requests, and provide advice and assistance to the public. The review ensures continued legal compliance, alignment with the updated Model Publication Scheme, strengthened responsibilities, and enhanced procedures for handling FOI requests. The policy states the Association's commitment to ensuring it does not unfairly discriminate against any individual or group, reflecting statutory equalities obligations. An Equality Impact Assessment has previously shown no unfair discrimination against protected groups.
2. Protected Characteristics	
	Commentary on impact. Positive/neutral/negative as well as mitigations
Age	Neutral The FOISA process applies equally to all members of the public, with no age-related barriers identified.
Disability	Potential Indirect Barriers – Mitigated Individuals with visual impairments, literacy difficulties or other disabilities may face challenges accessing published information. Mitigation: The Association provides information in accessible formats and supports individuals who cannot engage digitally or in writing—consistent with practice across EIAs for other policies.
Gender identity/ reassignment	Neutral No aspects of the FOISA process create barriers for trans or non-binary people.
Marriage/civil partnership	Neutral No policy provisions relate to marital or civil partnership status; no discrimination identified.
Pregnancy/ maternity	Neutral There is no differential impact on individuals who are pregnant or on maternity leave.
Religion or Belief	Neutral The policy explicitly states non-discrimination on grounds of religion or belief.
Race	Potential Indirect Barriers – Mitigated Individuals whose first language is not English may experience barriers to accessing FOI information. Mitigation: The Association can provide translated materials or interpretation support on request, in line with accessible communication practices referenced in other policy EIAs.
Sex/Gender	Neutral There is no differential treatment or impact based on sex/gender.
Sexual Orientation	Neutral No discriminatory consequences related to sexual orientation were identified.
Other	Potential Barriers – Mitigated Individuals with limited digital access may find it difficult to access online information.

	• FOISA allows requests to be made verbally, reducing digital exclusion. • Carers or individuals with limited time resources may benefit from the policy's obligation to provide advice and assistance.		
3. Sign Off			
Lead Assessor:	Joanna Thomson, Governance Officer		
Co- Assessor:	John McIntyre, Executive Director of Finance & Corporate Support		
Date initiated:	April 2025		
Consultation:	Not required for this update. This is consistent with other policy EIAs where minimal changes did not require further consultation.		
Research:	Review of all FOI-related internal policy documents.		
Signature:		Date:	