



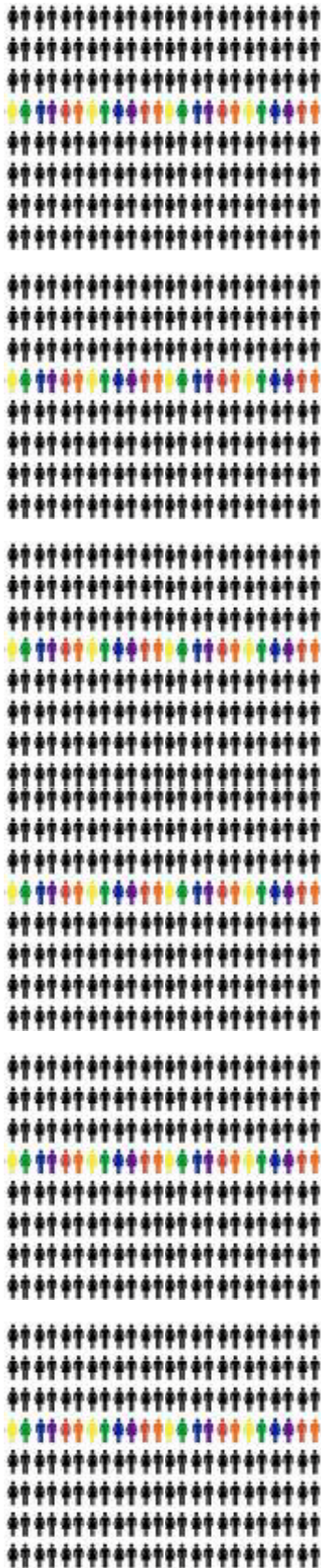
Change

Investment Programme  
*Cheshire & Warrington*

# Equality Impact Assessment Toolkit

**Cheshire & Warrington  
Change Up Consortium**

**Produced April 2008  
By Cheshire, Halton & Warrington  
Racial Equality Council**



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## **Introduction**

This toolkit was commissioned by the Change Up Consortium as part of its commitment to taking equality and diversity issues seriously.

At the moment only public sector organisations have a legal responsibility to carry out impact assessment under equality legislation, as a way to help them to meet their duty to eliminate discrimination and promote equality of opportunity. Third sector organisations, which the Change Up Consortium is primarily made up of, do not have such a responsibility. However, public sector organisations are required to show how they are discharging their duties through partnership working.

## **WHY?**

### **Why is the toolkit important to Third Sector Organisations?**

Public sector organisations have been carrying out equality impact assessments for many years because they have legal responsibility to do so under equality legislation. Third sector organisations however may never have even heard of an impact assessment before, let alone used one. So why is it important for the sector and the consortium?

Impact assessments are used by the public sector to make sure that their services are responsive to the needs of all communities and to ensure that they don't discriminate. The third sector also offers wide ranging services to the community and the only way it can be sure it is responding to the needs of those communities is to systematically review the way it works through equality impact assessment. Third sector organisations are just as open to challenge as public sector and as the third sector operates primarily through grants and commissioning it will become more and more necessary to demonstrate good equality practice.

### **This Toolkit**

This document is intended as a framework to essentially 'equality proof' documents, policies and procedures created by the Change Up

Consortium. It has been designed in a way which means that it can be used by both the Consortium as an entity in itself for its own policies, strategies and plans as well as by the organisations which the Consortium is composed of.

The toolkit will:

- Introduce an effective, robust method of equality proofing documentation
- Steer the Consortium towards sources of help, including key documents and additional information sources

## **WHAT?**

### **What do we mean when we talk about equality and diversity?**

Equality was sometimes defined as treating everyone the same, or treating everyone fairly. However, it is proportionate treatment, according to needs that leads to equal outcomes. This may mean treating groups in different ways to achieve real equality. Equality is about recognizing that people's needs are different and we should treat people as individuals and respond to their needs.

People often use the term 'diversity' interchangeably with equality. But whereas equality is concerned with equity and fairness, diversity is about positively appreciating the fact that everyone is different and unique.

There are 6 strands of equality that we will focus on within this process, which are all covered by legislation:

- Race
- Gender
- Disability
- Age
- Sexual orientation
- Religion or belief

### **What is an Equality Impact Assessment (EQIA)?**

Equality Impact Assessment is just a systematic way of looking at policies, procedures and strategies to decide whether they adversely affect any groups or individuals falling into the above 6 strands. The idea is to anticipate possible disadvantage before it happens or put in place measures that minimize that disadvantage.

The EQIA guidance and tool helps you and your organisation to identify who those people might be and what specific needs they may have that you will need to consider in developing and reviewing your policy.

Remember however that the process of Equality Impact Assessment is not an end in itself, the aim of the assessment is to promote equality of opportunity and make sure that we are not discriminating unwittingly in relation to one or more of the equality strands.

An EQIA is only as good as the information that is considered. To decide whether a group is affected differently – whether in a good or bad way, you must have some information available to you. It is therefore important to have as much knowledge as possible about how the proposed policy will affect people.

## HOW?

### Step 1 – Identify the Aims and Objectives of the Policy

The first step in the process is to identify *what* you intend the policy to achieve. Being clear about the aims and objectives of your policy will help you to think about how the needs of different groups of people need to be integrated into the policy's main aims and objectives.

### Step 2 - Information Collection

Information is really important to give us an understanding of the numbers and groups of people affected by our policies. While we might have a feeling that there may be some kind of impact, for the impact assessment process it is necessary to back up our beliefs with factual information. If we want to find out whether a policy is likely to impact negatively or positively on sections of the community, we should first discover if data or research already exists.

It is important to consider both qualitative and quantitative data. Qualitative data is about people's opinions, perceptions and experiences whilst quantitative data is all about numbers, facts and figures.

Data collection plays an extremely important role in the initial impact assessment, so much so, that if you don't have enough data to make an informed judgment as to whether there is differential impact, then the next step would be to put in place an effective monitoring system for the policy.

What do you already know about the needs or experiences of your target audience?

Useful information sources:

- Research
- Complaints
- Service user statistics
- Customer satisfaction surveys

What else do you need to know to help you understand the needs and/or experiences?



- Results of previous consultation/focus groups
- Inspectorate and review reports
- Front line employees comments
- Issues raised with or by elected members
- Staff surveys
- Local authorities
- Partner organisations
- Equality Groups
- Library/internet searches

### **What Information do I Need to Collect?**

There is lots of guidance around about data monitoring. But to give you an idea of the sorts of things you should be collecting as a minimum:

- Statistics on staff and board members broken down by ethnicity, gender, sexuality, religion, age and disability
- Statistics on service users
- Satisfaction rates of service users by equality strands

The consortium is reviewing its current policy on tendering. The consortium decides to pull together information on:

- Who has applied for tenders in the last two rounds
- The organisations who were successful
- What equality monitoring there was in place for the beneficiaries of the tenders
- To get some more qualitative data it decides to speak to those organisations which were unsuccessful to ask them what they thought of the process and whether there were any barriers for them

### **Step 3 – Assess Impact**

Once you have brought together the information, filled any gaps and involved appropriate people in the process then you can move on to assessing the impact of your policy or strategy.

You will hopefully have enough information to determine whether the policy will or is likely to have a differential impact on the relevant equality target groups. This might be positive or negative, direct or indirect and indicates that the policy affects a given group different from the majority.

It is also good practice to follow the public sector duty under the Disability Equality duty to look for a positive impact on target groups that may have been missed.

The key thing is to look for any evidence of adverse or negative impact as this could indicate that should the policy be adopted that equality groups are being disadvantaged.

#### **Signs of differential impact:**

Adverse impact will take different forms depending on the data available, but here are some examples of where adverse impact may occur:

- A lower participation/access rate of equality target groups compared with others
- Certain groups having lower success rates in particular processes
- Whether eligibility criteria (eg recruitment/selection) appears to disadvantage certain groups
- whether a group faces increased difficulty or indignity as a result of a policy
- whether a policy disproportionately reduces benefits for group

The Consortium decides to introduce a new environmental policy to encourage consortium members to think green. The policy essentially financially rewards those who car share or take public transport. When the consortium looks at how the policy would work, it becomes apparent that there is the potential for adverse impact as people who are disabled, or older and less able to get around may be disadvantaged as in general find it more difficult to do this.

The consortium decides to adopt the policy to encourage people to car share and take public transport, but takes the following actions:

- Holds meetings in more accessible venues
- Publishes information about disability friendly bus routes with the agenda
- Circulates information around the consortium of those who are willing to car share and where people are coming from

### **What Should I do if Differential Impact is Found?**

⇒ If no differential impact is found then there is no need to change the policy

⇒ If differential impact is found there are five possible courses of action:

1. change the policy
2. change the way the policy is implemented
3. keep the policy and justify it
4. replace the policy with another to achieve the same aims
5. abandon the policy

**What you can't do is nothing!! You must take action if you find differential impact or the possibility of it!!!**

## **Stage 4 – Respond to the Results of Impact Assessment**

Where likely negative impact is found as a result of an impact assessment, then alternatives to the policy must be considered (see above options).

If you decide to keep the policy and justify it, you must be able to demonstrate that you have considered alternative ways to achieve the policy aims without discriminating against the target group!

You must demonstrate that the policy is on grounds *unconnected* with the discrimination that is taking place and secondly it has proved impossible to find other ways of achieving the policy's aims without causing a negative impact for one or more relevant groups.

### **What types of interventions could counter negative impact?**

Types of intervention could include positive action or training. The key is to consider the causes of differential impact and then think of ways to tackle it.

Cheshire Cats, a large voluntary sector organisation decides to impact assess its promotions policy. It finds that it has fewer BME staff gaining promotion than their white counterparts once qualifications and experience has been taken into account. The organisation decides to investigate the reasons for this and considers steps that can be taken to rectify it.

Consultations carried out suggest that there were a variety of reasons for the adverse impact, and not a single dominant one:

- Racism
- Lack of confidence of BME staff to put themselves forward
- Few role models for BME staff
- A lack of transparency in the process

The organisation decides to take several steps to mitigate the adverse impact:

- Give staff regular anti racism training
- Introduce a BME mentoring scheme
- Clearly convey the promotions policy through increased marketing

## **Stage 5 - Consultation**

In addition to involving the appropriate equality groups earlier in the process (see step 2) consultation should also take place on the final policy. Consultation is one of the key elements to carrying out a meaningful impact assessment. It is imperative to hear the views of all sections of the community which may be affected by the policy. It is especially important to consult with those groups you believe might suffer a potentially negative impact. Different methods of consulting are more effective for some groups than others and consideration needs to be given as to when and where the consultation takes place.

### **When Should I Consult?**

Consultation would normally be completed after you have assessed possible impact. This provides an extra mechanism for checking that work undertaken on modifying the policy has been suitable. It is also courteous to those previously involved and helps them feel that their contributions have been valued, which helps to guard against consultation fatigue. The ideal is to build as much involvement as possible into the earlier stages of the impact assessment process to ensure the views of the equality group in question are taken into account as far as possible in drawing up the final policy, and therefore reflects their needs as accurately as possible.

### **Do I have to consult on every policy on every impact assessment?**

It is good practice to consult as part of each impact assessment, but the level of that consultation will differ according to the type of policy.

Impact assessment should be proportionate and not overly onerous. Policies that impact significantly on the public will require more consultation than those that do not. So for example a new policy on grant giving, or on recruitment would need more consultation than a new internal IT policy.

Consultation needn't be over expensive or time consuming. Third sector organisations have all sorts of ways they can ask opinions:

- Voluntary sector networks
- Newsletters
- Service user questionnaires
- Key partners
- Committee meetings
- AGMs
- Websites



If in doubt see appendix 4 to check out organisations that may help...

## **Stage 6 – Publishing**

Public sector organisations have a legal duty to publish the results of their impact assessments and it is good practice to do this. Publication provides an opportunity to demonstrate your commitment to equality and diversity and to draw attention to the work you are doing.

Before you publish you will need to decide in what format you will publish, and may want to consider the following questions:

- *Do you want to publish each impact assessment as you do them, or all at once every 6 months/year?*
- *Do you want to publish the whole form, or in a summary format?*
- *Do you want to provide them only on request or do you want to positively promote the impact assessment process?*

## **Where do I need to publish? Isn't it costly?**

You can publish it how you think it is appropriate. For example if it was a new internal staff policy you might decide to put it on the notice board but if it were about your services you may want to put it in your newsletter or on the website.

## **Stage 7 – Monitoring and Review**

It is important that impact assessment is not seen as a one off process, but rather part of quality control.

Monitoring is fundamental to the process. Mechanisms should be in place for regular reassessment of policies – ideally every 3 years. For new policies EQIA should be an integral part of policy making and should begin as soon as the new policy is under consideration.

Yappy Youth, a voluntary sector youth group decide to carry out an equality impact assessment on their new policy to charge for certain services. What they realize however through the process is that they don't have enough information about their service users to make an adequate judgment on whether some groups would be adversely affected.

They decide to hold a one off consultation with current users of the service to inform the policy and fill the information gap as best they can. They take on board the comments from the group and implement the policy with these changes. They also agree a robust monitoring process for the future. They undertake to review the policy in 12 months when they have gathered the user information that they need.

You should aim to carry out the EQIA at the beginning of planning a new policy or review of an existing policy.



Monitoring information should reflect the data you will need, so don't monitor it if you're not going to use it!

## **What Sort of Information Should We Monitor?**

It depends on the information that you need. Think about what you think will help you assess differential impact before you put in place new mechanisms.

For equality impact assessments you would normally monitor under the 6 key equality strands:

Ethnicity – minimum information requested is per the census 2001 categories – 16 + 1 categories, but you may wish to reflect local community changes eg Eastern European or Gypsies and Travellers to get better information

Disability – whether they consider themselves to be disabled or not

Gender – male, female or transgender

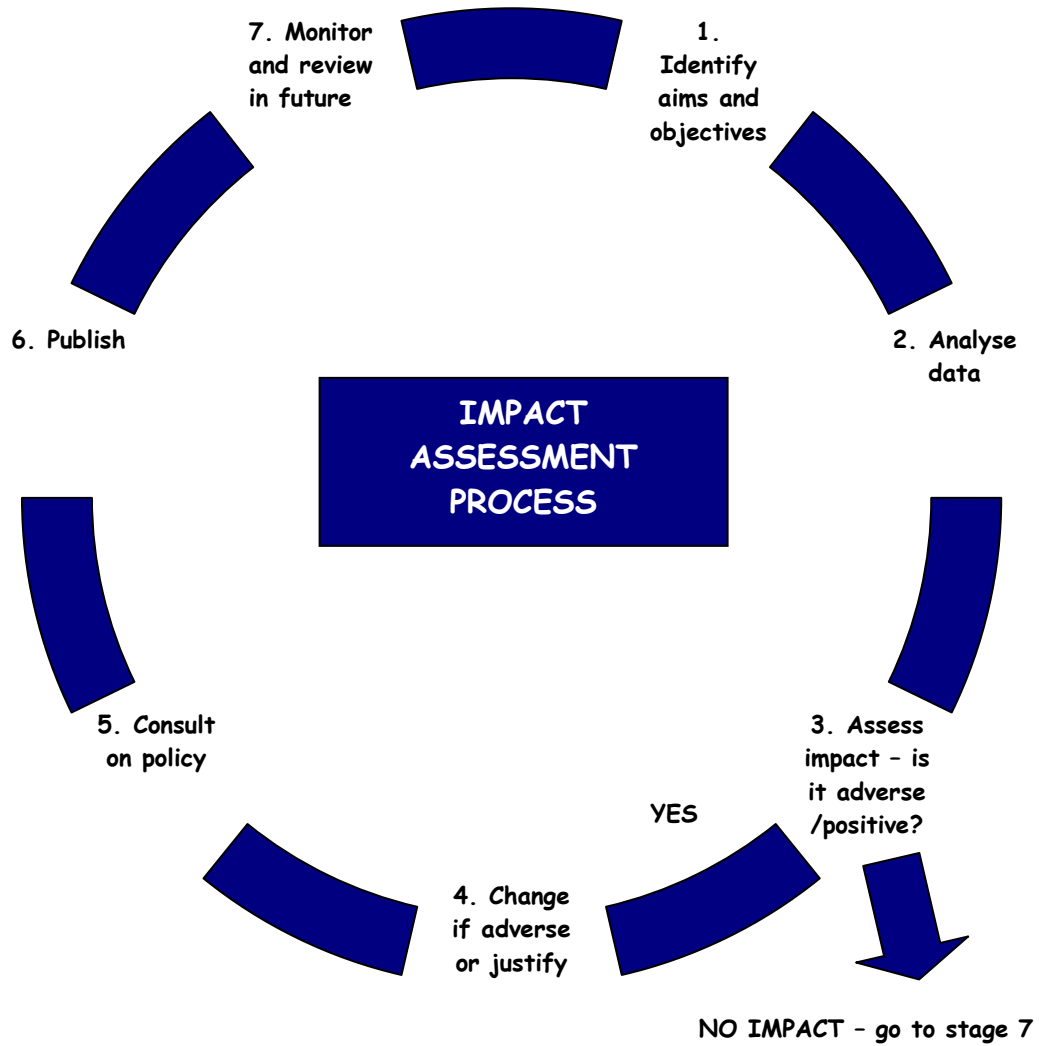
Sexuality – straight, gay, lesbian, bisexual

Religion – remember to include belief in this as not everyone has a religion

Age – you may want to use categories or bands rather than ask their age to get a broad idea of how things affect particular groups – ie younger, middle aged and older people

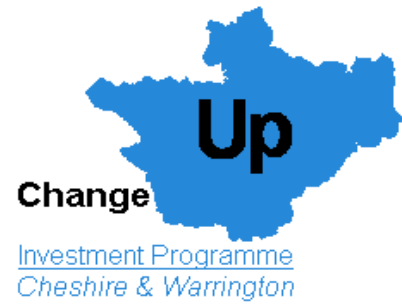


## Monitoring & Review Process



# EQUALITY IMPACT ASSESSMENT FORM

## CHANGE UP CONSORTIUM



<b>PERSON CARRYING OUT ASSESSMENT</b>			
<b>DATE</b>			
<b>NAME OF POLICY OR FUNCTION</b>			
	<b>POLICY</b>	<input type="checkbox"/>	
	<b>STRATEGY</b>	<input type="checkbox"/>	
	<b>NEW</b>	<input type="checkbox"/>	
	<b>EXISTING</b>	<input type="checkbox"/>	
<b>1/ MAIN AIMS OF THE POLICY – ‘policy’ includes services, plans, strategies or functions</b>			
a) What is the aim or purpose of this policy?			
b) Who is intended to benefit from the policy and in what way?			
c) How did they get involved in developing this policy?			

d) What do you want to see come out of this policy?

## 2/ CONSIDER THE EVIDENCE & COLLECT THE INFORMATION

a) Are there any experts or relevant groups who you can or should approach to explore their views on the issues?

b) What do we know from existing information?

Qualitative

Quantative

c) How have you consulted with stakeholders and equalities groups likely to be affected by the policy?

d) What do they think?

e) What gaps are there in the information you have?

f) Do you need to collect additional data or carry out additional research to enable the impact of different equality groups to be assessed? If yes what additional data do you need?

**3/ ASSESS LIKELY IMPACT**

a) Is there likely to be any differential impact on any equality group? If yes, state why it might be adverse and give further details

<p>(i) Grounds of race, ethnicity, colour, nationality or national origins eg people from different ethnic backgrounds, Gypsies and Travellers, refugees and asylum seekers</p>	<p><input type="checkbox"/> yes <input type="checkbox"/> no</p>	<p><input type="checkbox"/> adverse (please give further details)</p>
<p>(ii) Grounds of sex or marital status women and men</p>	<p><input type="checkbox"/> yes <input type="checkbox"/> no</p>	<p><input type="checkbox"/> adverse (please give further details)</p>
<p>(iii) Grounds of gender Transsexual or transgender</p>	<p><input type="checkbox"/> yes <input type="checkbox"/> no</p>	<p><input type="checkbox"/> adverse (please give further details)</p>
<p>(iv) Grounds of religion or belief : Religious/faith groups or anyone with a recognized belief system</p>	<p><input type="checkbox"/> yes <input type="checkbox"/> no</p>	<p><input type="checkbox"/> adverse (please give further details)</p>
<p>(v) Grounds of physical or sensory impairment or mental disability</p>	<p><input type="checkbox"/> yes</p>	<p><input type="checkbox"/> adverse (please give further details)</p>

Disabled people	<input type="checkbox"/> no	
(vi) Grounds of age Older people, children and young people	<input type="checkbox"/> yes <input type="checkbox"/> no	<input type="checkbox"/> adverse (please give further details)
(vii) Grounds of sexual orientation Lesbian, Gay and Bi Sexual	<input type="checkbox"/> yes <input type="checkbox"/> no	<input type="checkbox"/> adverse (please give further details)

<p>c) Is the policy directly discriminatory?</p> <p><input type="checkbox"/> yes <input type="checkbox"/> no</p> <p><i>(under any discrimination legislation eg Sex Discrimination Act, Race Relations Act, Disability Discrimination Act, Religion or Belief Regs, or Sexual Orientation Regs)</i></p>	<p>d) Is the policy indirectly discriminatory?</p> <p><input type="checkbox"/> yes <input type="checkbox"/> no</p> <p>If you said yes, is this objectively justifiable or proportionate in meeting a legitimate aim?</p> <p><input type="checkbox"/> yes <input type="checkbox"/> no</p>	<p>e) Is the policy intended to increase equality of opportunity by permitting positive action or action to redress disadvantage?</p> <p><input type="checkbox"/> yes <input type="checkbox"/> no</p> <p>Please give details</p>
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#### **4/ CHANGES**

In your consideration of the next questions, you should think about the following:

- *How does each option further or hinder equality of opportunity?*
- *How does each option challenge or reinforce stereotypes which influence equality of opportunity?*
- *What are the consequences for the group(s) and the public authority/organisation of not adopting an option more favourable to equality of opportunity?*
- *What are the social and economic costs and benefits of implementing each option?*
- *Will the benefits of implementing the change outweigh the costs?*

- a) If the policy could have an adverse impact on any group, how could you change the initiative to reduce or eliminate any identified negative impacts or to create positive parts of the development?

#### **5/ CONCLUSION**

a) What are the main areas requiring further attention?

b) What is the RECOMMENDATION having considered the information?

reject the policy

- introduce the policy
- amend the policy
- other .....

**6/ MONITORING & REVIEW**

a) How will the implementation of the policy be monitored?

b) How will the results of monitoring be used to develop future policy and practice?

c) When is the policy due to be reviewed?

**7/ PUBLIC AVAILABILITY**

a) What are the arrangements for publishing the results of the impact assessment?

## Appendix 1 Memory Prompt/Checklist

When looking through policies please consider the following:

Intended impacts	These are the objectives and desired outcomes of your policies. You must consider how these will affect different sectors of the community
Unintentional impacts	These are any institutional barriers acts or omissions that could have a detrimental effect for certain sections of the community eg barriers to prevent off road motor bike access to green spaces may impede access for wheelchair users and people with pushchairs
Negative impact	Where you identify any potential for negative impact you should consider making changes. If the negative impact would amount to unlawful discrimination you must make changes to your proposal unless there is an objective, lawful reason to justify it
Positive impact	This means the positive impacts which could benefit a particular group in equality terms eg positive action measures
Promotion of equality	Promoting equality will improve both the quality and equality of the policies and practice.
Promotion of good community relations	Making clear your plans and aims means that all decisions are open and transparent and accountable to all the communities within Cheshire and Warrington.



Groups at risk of discrimination, unfavourable treatment or social exclusion include:

- People who are male, female, transgender
- People of all racial or ethnic backgrounds including people who use languages other than English and the Gypsy and Traveller community
- People of all religions or beliefs including those who do not have a religion or belief
- People with a disability or those caring for a person with a disability
- People of all sexual orientations
- People of all ages

<b>Strand</b>	<b>Possible Affected Groups</b>	<b>Issues to Consider</b>
AGE	Children, young people, older people, retired people	Assumptions about age against experience and capability. Teenage parents, children as carers, communication to be age appropriate
DISABILITY	Mobility, sight, hearing, speech and language disability, mental health, cancer sufferers,	Accessibility of formats & communication. Physical and sensory access including transport and environment. Giving enough time, removing barriers
GENDER	Male, female and transgender	Women as predominant carers, physical access (pushchairs), single parents, costs of caring, underachievement or under representation
RACE	Black and Minority Ethnic communities including Gypsies and Travellers and	Respecting and reflecting diverse cultures, lifestyles and values. Communication formats, language needs.

	Migrant communities	
RELIGION OR BELIEF	Various faith communities, atheists	Respecting and reflecting diverse cultures, lifestyle, custom and values
SEXUAL ORIENTATION	Lesbian, Gay, Bisexual, or heterosexual	Assumptions about partners, or family types, invisibility, dignity

## Appendix 2 Language

<b>Don't use</b>	<b>Use</b>
Blind	Has a visual impairment (many people who are registered blind have some sight)
Coloured	Black, Asian, Chinese etc
Crippled	People with impairments and long term health conditions
Deaf/mute/profoundly deaf	Use deaf if they have no hearing, use hearing impairment if they have some hearing
Dumb	Has a speech impediment
Half caste	Mixed race/dual heritage
Handicapped	Disabled
Mentally handicapped	Has a learning disability
Mongol	Person with Downs Syndrome
Negro	Black
Non White	Black
Spastic	Person with cerebral palsy
Wheelchair bound	Wheelchair user

## Appendix 3

### Useful Documents

1. Strategy Paper on Mainstreaming Diversity within the Change Up Programme

<http://www.changeup.org.uk/nationalprojects/equalitydiversity.asp>

2. Race Equality Framework and Guidance for Sub Regional

Consortia <http://www.changeup.org.uk/regions/yorkshirehumber.asp>

## Appendix 4

### List of Useful Contacts/Organisations

This list is only a starter for ten with groups who may be able to assist you, or have access to information that could assist with EQIA. There will obviously be many more local community and voluntary sector organisations that could also contribute. The best place to find this information is through your local Voluntary Action.

#### Cheshire & Warrington

##### Race Equality & Religion

Cheshire, Halton & Warrington  
Racial Equality Council  
92 Watergate Street  
Chester  
CH1 2LF  
Tel: 01244 400730  
E: [office@chawrec.org.uk](mailto:office@chawrec.org.uk)  
W: [www.chawrec.org.uk](http://www.chawrec.org.uk)

Warrington Ethnic Communities  
Association  
The Gateway  
Warrington  
WA1 1SR

##### Age

Youth Federation  
17 Castle Street  
Chester  
CH12DS  
T: 01244 325867  
[www.youthfed.org](http://www.youthfed.org)

##### Age Concern

314 Chester Road,  
Hartford,  
Northwich,  
CW8 2AB

General Enquiries: 01606  
881660  
Information & Advice: 01606  
881668  
[www.ageconcerncheshire.org.uk](http://www.ageconcerncheshire.org.uk)

##### Disability

Warrington Disability  
Partnership  
The Centre for Independent  
Living  
Beaufort Street.  
Warrington  
Cheshire  
WA5 1BA

Tel: 01925 240064  
E:  
[info@disabilitypartnership.org.uk](mailto:info@disabilitypartnership.org.uk)  
[www.disabilitypartnership.org.uk](http://www.disabilitypartnership.org.uk)

Macclesfield Disability  
Information Bureau  
Pierce Street,  
Macclesfield,  
Cheshire,  
SK11 6ER

Tel: 01625 501759

E: [info@maccdib.org.uk](mailto:info@maccdib.org.uk)  
[www.maccdib.org.uk](http://www.maccdib.org.uk)

### **Gender:**

West Cheshire Multicultural  
Women's Group  
92 Watergate Street  
Chester  
CH1 2LF

T: 01244 350340

### **Gay, Lesbian and Transgender**

Unique – transgender issues  
Tel: 07704 442665  
E: [elen@uniquetg.org.uk](mailto:elen@uniquetg.org.uk)  
[www.uniquetg.org.uk](http://www.uniquetg.org.uk)

Body Positive  
PO Box 321  
Crewe  
CW2 7WZ  
T: 01270 653150  
[www.bpcnw.co.uk](http://www.bpcnw.co.uk)

### **Nationally:**

Equality & Human Rights  
Commission  
Arndale House  
The Arndale Centre  
Manchester  
M4 3AQ

Helpline: 0845 604 6610  
[www.equalityhumanrights.com](http://www.equalityhumanrights.com)

Stonewall  
Tower Building  
York Road  
London SE1 7NX

Telephone: 020 7593 1850  
Info Line: 08000 50 20 20

[www.stonewall.org.uk](http://www.stonewall.org.uk)

Government Equalities Office  
[www.equalities.gov.uk](http://www.equalities.gov.uk)

Friends, Families and  
Travellers  
Community Base  
113 Queens Road  
Brighton  
E. Sussex, BN1 3XG  
Tel: 01273 234 777  
[www.gypsy-traveller.org](http://www.gypsy-traveller.org)

Migrant Workers North West  
T: 0161 877 6331  
[www.migrantworkersnorthwest.org](http://www.migrantworkersnorthwest.org)