

**Supporting Good Decisions**

**Promoting Equality and Human Rights;**

**Reducing Poverty; and**

**Protecting the Environment**

**Integrated Impact Assessment Form**

**Integrated Impact Assessment (IIA) Form**

**Promoting Equality and Human Rights;**

**Reducing Poverty; and Protecting the Environment**

|  |  |
| --- | --- |
| **Title of Policy/ Proposal** | Equality Plan 2021-2025 |
| **Timescale for Implementation** | December 2021 – December 2025 |
| **IIA Completion Date** | 27th October 2021 |
| **Completed by** | Linda Alexander and Paolo Vestri |
| **Lead officer** | Linda Alexander |

**Section 1: Screening**

**1.1 Briefly describe the policy/proposal/activity you are assessing.**

*Set out a clear understanding of the purpose of the policy/ proposal/ activity being developed or reviewed (e.g. objectives, aims) including the context within which it will operate.*

The Equality Plan sets out the council’s intentions to meet the statutory duties set out by the Equality Plan 2010:

* A commitment to eliminating unlawful discrimination, promoting equality of opportunity, fostering good relations between different groups in our society, and aiming to ensure that no one is denied opportunities because of who they are.
* To ensure these principles underpin all the work the council does.

This Plan contributes to helping the council meet its vision of *‘A prosperous, safe and sustainable East Lothian, with a dynamic and thriving economy that enables (all) our people and communities to flourish’* and to the strategic themes outlined in the [East Lothian Council Plan 2017-2027](https://www.eastlothian.gov.uk/info/210592/community_planning/11857/the_east_lothian_plan_2017-27):

* 1. **What will change as a result of this policy?**

The Council Plan sets out nine strategic goals in which we aim to:

* Reduce unemployment and improve the employability of East Lothian’s workforce
* Reduce the attainment gap and raise the attainment and achievement of our children and young people
* Improve the life chances of the most vulnerable people in our society
* Extend community engagement and decision making and increase community and individual resilience
* Deliver transformational change and harness the opportunities that technology offers in the provision of services.

As we pursue these goals, we will meet our statutory duties to mitigate discrimination and inequality by:

* Ensuring our services meet the needs of all people in our communities and that communities have choice and control over the services they use where appropriate;
* Challenging ourselves to tackle any inequality that exists in our communities and work together with our partners to improve outcomes for equality groups;
* Tackling prejudice and negative attitudes towards people and celebrate the diversity within our community.

As a result of this plan and working towards a mainstreaming approach we will be able to ensure that we consider the protected characteristic groups and socio-economic impact. This will help to ensure discrimination and inequalities are addressed.

* 1. **Deciding if a full Impact Assessment is needed.** Please answer the following questions:

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|  | **Yes** | **No** |
| 1. The policy/ proposal has consequences for or affects people e.g. how they can access a service? | x |  |
| 1. The policy/proposal has potential to make a significant impact on equality and human rights, socio-economic disadvantage, the council’s role as a corporate parent, or the council’s commitment to tackling climate change? | x |  |
| 1. The policy/proposal is likely to have a significant environmental impact as defined by the Environmental Impact Assessment (Scotland) Act 2005? |  | x |
| 1. The policy/ proposal involves a data processing activity (storage / collection of personal data) that is likely to result in a high risk to individuals as determined by Article 35 of the General Data Protection Regulation? |  | x |

* If you have answered yes to questions 1 and 2 above, please proceed to complete the Integrated Impact Assessment. If you have answered No then an IIA does not need to be completed. Please keep a copy of the screening paperwork.
* If you have answered yes to question 3, you will need to consider whether you need to complete a Strategic Environmental Assessment.
* If you have answered yes to question 4, you will need to consider whether you need to complete a Data Protection Impact Assessment. Please seek further advice from the Team Manager Information Governance.

**Section 2: Integrated Impact Assessment**

**2.1 Have those who are directly affected by the policy had the opportunity to comment on new proposals?**

Yes. Consultation has taken place through the summer 2021. This was completed via the council’s consultation hub, community agencies and networks. Additionally to increase reach, Lothian and Edinburgh based groups such as the Edinburgh and Lothian Regional Equality Council, Religious, Disability and LGBTQi representative organisations were contacted to promote the consultation to their service users who may work or live in East Lothian. The organisations themselves were also encouraged to take part in the consultation.

Staff were equally made aware and encouraged to comment on the proposals.

* 1. **What information/data have you used to inform the development of the policy to date?**

A range of consultation information has contributed to this plan which also builds on the 2017-2021 equality plan. These include:

* Equalities Monitoring report –workforce and recruitment profiles 2019-2020
* Gender pay gap report 2019-2020
* Poverty Plan 2021-23 data including information taken from the Scottish Index Multiple Disadvantage SIMD
* Education pupil data and attainment
* Children’s Service Plan 2020 – 2025
* Child poverty action plan 2020
* Corporate Parenting Plan 2017-2020
* Mainstreaming outcomes report 2017-2019 and draft mainstreaming report 2019-2021
* East Lothian by numbers Deprivation and Inequality
* English for Speakers of other languages data (ESOL)
* Covid 19 data and analysis
* 2021 Employee Engagement Survey

The on line consultation on the draft Equality Plan received few responses. Of the responses that were received 30% said the council needs to do more to more to advance equality of opportunity. 50% provided suggestions that related to fostering good relations such as using the curriculum to facilitate a fairer society; children’s clubs to facilitate contact and interaction between people, with 10% suggesting more engagement with minority populations/groups.

A separate consultation on the draft Poverty Plan that took place at the same time as the Equality plan consultation found around a third of respondents feel the council does not take equalities seriously.

Disaggregated protected characteristic information has been used where provided, however this is limited. Both consultations attracted very few responses generally or from those indicating a protected characteristic. This will be addressed as a new action in section 3. Additionally we will update the council’s ‘A Guide to Monitoring Equalities in Council Services’ to provide clear guidance on how to monitor equalities effectively in service areas; and develop a suite of Equality Outcomes Indicators and report on progress in meeting these outcomes in bi-annual Equality Outcomes and Mainstreaming Progress Reports.

* 1. **What does the evidence/ research suggest about the policy’s actual or likely impact on equality groups and those vulnerable to /or experiencing socio-economic disadvantage?**

Our local research, consultation and data collection indicate that more people across the protected characteristics are living in poverty, with violence towards women and girls increasing in line with national trends. We are also aware of increases in hate crime.

The Marmot report and the Dahlgren and Whitehead social determinants of health and wellbeing model inform our thinking. The Equality and Human Rights Commission, the Scottish Index of Multiple Deprivation, Joseph Rowntree foundation for all show the difference that informed policy, practice and decision making can make to outcomes for equality groups and vulnerable populations.

These and other information indicate that the current actions set out in the Equality Plan, which also build on the actions of the previous plan, will have a positive impact on equality groups and those vulnerable to socio economic disadvantage.

* 1. **How does the policy meet the different needs of groups in the community?**

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| **Equality Groups** | **Comments** |
| To ensure the plan meets the different needs of groups in the community we will monitor Customer Feedback across the protected characteristics as part of equality data collection development. Complaints that raise concerns about inequality and discrimination will inform appropriate action. This action forms part of the intention to develop equality data processes across the council.  The following is not exhaustive as some actions are set out in specific plans and strategies within separate Integrated Impact Assessment. These can be found on the council’s website. In this plan the following are included: | |
| Older people, people in the middle years | * In relation to the protected characteristic (PC) of Age, there is nothing specific to older people. However this will intersect with other PC’s such as Sex. |
| Children and young people children | * The gap in educational outcomes for children and young people impacted by socio-economic disadvantage, and in literacy rates, between boys and girls in primary school will be closed and the health and wellbeing of children and young people with protected characteristics will be improved; * LGBTQi+ equality in schools and communities, including support for transgender pupils. |
| Women, men and transgender people (includes issues relating to pregnancy and maternity) | * Supporting services including schools, housing services and care homes to consider transgender equality, and ensure a positive experience for those who need services;  1. People feel safe and experience less crime in their communities, and at home, people feel their communities are inclusive and there is zero tolerance of hate, abuse and violence against women and girls;  * Implement Equally Safe Scotland Strategy to prevent and eradicate Violence Against Women and Girls and will undertake an analysis of how well we are delivering Equally Safe across all council systems, policies and services and develop an action plan; * Review the impact of the Licensing Board’s policies in contributing to this outcome; * Support Police Scotland and other partners in developing a joint approach/ strategy to address hate crime; * Work with Police Scotland and other partners to develop a Safe Spaces initiative, (based on the Ayrshire & Arran Safe Spaces project) to change attitudes and behaviours so that everyone in East Lothian, including people who share protected characteristics, feel safe in their communities. |
| Disabled people (includes physical disability, learning disability, sensory impairment, long-term medical conditions, mental health problems) | * Facilitating interpretation and translation services across a broader range of services, including access to British Sign Language * Curriculum transitions between primary and secondary schools * Put in place the recommendations of the council’s British Sign Language Plan * Improve the accessibility of the council’s website |
| Minority ethnic people (includes Gypsy/Travellers, migrant workers) | * Address the hate crime experienced by Black and Minority Ethnic (BME) communities, particularly business owners, those with physical and learning disabilities, and LGBTQi+; * We know that there is an equality dimension to the pandemic, with women, disabled people and minority ethnic communities particularly affected. This data is informing recovery work; * Improve communications in minority languages including a review of the Translation and Interpretation service; * Review recruitmentprocedures and practice with the Scottish Government’s Minority Ethnic Recruitment Toolkit and make the necessary changes. |
| Refugees and asylum seekers |
| People with different religions or beliefs (includes people with no religion or belief) | * Identifying meeting spaces to meet religious needs during religious periods; * Address the hate crime experienced by Black and Minority Ethnic (BME) communities, particularly business owners. |
| Lesbian, gay, bisexual and heterosexual people | * LGBTQi+ equality in local schools and communities, including support for transgender pupils |
| People who are unmarried, married or in a civil partnership | Will be protected in employment through HR equality policy and practice |
| **Those vulnerable to falling into poverty** | |
| Unemployed  People on benefits  Lone Parents  Care experienced children and young people  Carers (including young carers)  Homeless people  Those involved in the community justice system  People with low literacy/numeracy  Families with 3 or more children  Those with a child/ children under 1 | The East Lothian poverty plan sets out to reduce and prevent poverty in East Lothian and this equality plan will considers the intersectionality of poverty across the protected characteristics (we are aware that we need to develop more robust data systems):   * Reduce unemployment and improve the employability of East Lothian’s workforce; * Reduce the attainment gap and raise the attainment and achievement of our children and young people; * Improve the life chances of the most vulnerable people in our society; * Extend community engagement and decision making and increase community and individual resilience; * Deliver transformational change and harness the opportunities that technology offers in the provision of services.   For example:   * #KeepThePromise, a new Promise Partnership Team will work with our Partners in Co-design Panel to ensure that the voice of care experienced young people is heard; * Targeted support for families at risk of hardship; * East Lothian Works continues to deliver Adult Literacy & Numeracy, Employability with integrated literacies and ESOL provision, including ESOL for the Syrian Resettlement Programme. All provision was delivered remotely in 2020/21. * Education & children’s Services establishment of a new Early Intervention Support Team to target support to children and young people aged 5-12 years through a combination of Family Support and Outreach Teacher Support. |
| **Geographical communities** | |
| Rural/ semi-rural communities  Urban Communities  Coastal communities  Those living in the most deprived communities (bottom 20% SIMD areas) | The council’s Transport Strategy commits to developing more integrated travel solutions that better meet local need, particularly in more rural areas.  Continue to improve the experiences of Gypsy Travellers by meeting the requirements of the Scottish Governments Gypsy Traveller strategy.  The Poverty Plan reinforces the use of the Integrated Impact Assessment to address socio economic impact as a whole, and to ensure intersectionality with the protected characteristics are taken into account when planning and designing services and when making decisions. |
| **People with communication needs** | |
| Gaelic Language Speakers {refer if necessary to the Council’s Gaelic Language Plan}  British Sign Language (BSL) users {refer if necessary to the Council’s BSL Plan}  English as a Second Language  Other e.g. Deafblind, Plain English, Large Print | The council’s Gaelic Language Plan sets out how the council treats Gaelic language speakers with equal respect.  The BSL plan sets out our actions and can be found here: [British Sign Language Plan | British Sign Language Plan | East Lothian Council](https://www.eastlothian.gov.uk/info/210602/equality_and_diversity/12456/british_sign_language_plan)  We continue to improve communications in minority languages including face to face support. Additionally, as noted previously East Lothian Works delivers ESOL provision, including ESOL for the Syrian Resettlement Programme.  The council website is embedded with an Interpretation and Translation tool.  We will continue to monitor and develop accessible services and information as set out in out Accessibility Policy 2021-2023.  • review the Translation and Interpretation service to ensure that communications is provided in minority languages  • improve the accessibility of our website  • monitor Customer Feedback for complaints that raise concerns about inequality and discrimination and ensure that appropriate action is taken  • put in place the recommendations of the Digital inclusion Strategy |

* 1. **Are there any other factors which will affect the way this policy impacts on the community or staff groups?**

As we emerge from the COVID pandemic the current economic outlook will potentially impact budget availability and its implication for staffing and resources.

* 1. **Is any part of this policy/ service to be carried out wholly or partly by contractors? If yes, how have you included equality and human rights considerations into the contract?**

No, there is currently no work being completed by contractors either wholly or partly.

* 1. **Have you considered how you will communicate information about this policy or policy change to those affected e.g. to those with hearing loss, speech impairment or English as a second language?**

We will produce an easy read version and respond to requests for the plan to be available in the necessary language including BSL. A planned BSL event will take place in November 2021 and new information will form part of our plan; a BSL summary of the plan will be available prior to the event.

* 1. **Please consider how your policy will impact on each of the following?**

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| --- |
| **Equality and Human rights**   * Promotes / advances equality of opportunity e.g. improves access to and quality of services * Promotes good relations within and between people with protected characteristics and tackles harassment * Promotes participation, is inclusive and gives people control over decisions which affect them * Preserves dignity and self-respect of individuals (does not lead to degrading treatment or stigma) * Builds support networks, resilience, community capacity |
| We have included ‘promotes good relations’ as a core policy theme within the new Integrated Impact Assessment process to help us ensure we maximise our awareness of this area of work. In this plan we have set out to:   * + - Support events and programmes, such as religious festivals, Black History Month, International Women’s Day and Pride events that celebrate diversity within our communities;     - Continue to embed the IIA process to focus policy and practice development to meet out statutory duties;     - Ensure everything we do is inclusive and accessible, including information and events to ensure people from the different protected characteristics and socio economic backgrounds come together;     - Our community networks and partnerships are inclusive to ensure all voices are heard. |
| **Socio-Economic Disadvantage / reducing poverty**   * Maximises income and/or reduces income inequality * Helps young people into positive destinations * Aids those returning to and those progressing within the labour market * Improves employability skills, including literacy and numeracy * Reduces the costs of taking part in activities and opportunities * Reduces the cost of living |
| The 2021 Poverty Plan consultation evidences Scotland and UK wide impact of COVID on new and entrenched poverty. The Plan sets out a range of actions to address the points listed. Please see previous link to read the plan. |
| **Tackling Climate Change**   * Reduces the need to travel or increases access to sustainable forms of transport * Minimises waste / encourages resource efficiency / contributes to the circular economy * Ensures goods / services are from ethical, responsible and sustainable sources * Improves energy efficiency / uses low carbon energy sources * Protects and/or enhances natural environments / habitats / biodiversity * Promotes the transition to a low carbon economy * Prepares and/or adapts communities for climate change impacts |
| Addressing Climate Change and taking action to meet the zero emission target has not been included as a specific objective in the Equality or Poverty Plan but it is a key driver of the Council Plan and East Lothian Plan. Several actions in the Plan, such as reducing fuel poverty and tackling digital exclusion, will have a significant positive impact in addressing climate change and help East Lothian meet the net zero emission target.  Additionally our approach to addressing period poverty encourages the use of environmentally sustainable products. |
| **Corporate Parenting and Care Experienced Young People**   * Impacts on care experienced young people * Provides opportunities or reduces opportunities to participate in activities which are designed to promote the wellbeing of young people * Adversely affects the wellbeing of young people * Adversely impacts on outcomes for care experienced young people |
| East Lothian Champions Board engagement with young people showed that poverty and inequalities are entrenched for this group. The general consensus from respondents was that the council or public bodies could be doing more. Support featured heavily with income maximisation, budgeting and linking people to the right services’. Some group participants wish to be involved in further poverty plan work.   * **Deliver ‘the promise’ for children in care** #KeepThePromise, a new Promise Partnership Team will work with our Partners in Co-design Panel to ensure that the voice of care experienced young people is heard. |

**Section 3. Action Plan**

**What, if any changes will be made to the proposal/ policy as a result of the assessment?**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Changes to be made** | **Expected outcome of the change** | **Resources Required** | **Timeline** | **Responsible person** |
| Improvements to data collection and use. | Consistent data collection categories used by all services. Guidance developed and IT systems collect protected characteristic data which is used to inform policy and service development and address barriers. | Existing staff | On going | Service Manager  Equalities Officer |
| Improved networking with representative groups. | Direct contact and relationships with representative groups and individuals will inform council policy and practice.  Meet needs of new scots and other refugees and asylum seekers being placed in, or choosing to live in East Lothian. | Existing staff and key partner agencies e.g. Volunteer Centre East Lothian, Health & Social Care Partnership | On going | Equalities Officer  Connected Communities team  Equalities Officer |
| Re-establish the Equality and Diversity Network. | Existing Staff | By 31 March 2022 |

**For consideration of the Head of Service**

*Can you identify any cumulative impacts on equality groups or vulnerable people arising from this policy, when considered alongside other changes across other services?*

**Sign off by Head of Service**

Name: Sharon Saunders, Head of Communities

Date: 25 October 2021