

Appendix 3

Midlothian Council Equality Impact Assessment Form



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Revision History

Revision date	Version	Summary of Changes	Changes made by	Changes marked
18.12.13	0.1	First draft begun.	JM	-
9.1.14	0.1	First draft completed & circulated for comment to project team members, MVA and Equalities Officer.	JM	
14.1.14	0.1	Corrected numbering.	JM	-
16.1.14	0.2	Updated with comments received.	JM	-
10.2.14	0.3	Circulated to Co-Production Panel for comments	JM	-
26.2.14	0.4	Updated to reflect the work of the first 2 Panel meetings. Circulate to project team for comment.	JM	Yes – Update 26.2.14.
3.3.14	0.5	Updated to reflect project team comments.	JM	-
6.3.14	0.6	Updated to reflect the outputs of a workshop with Midlothian People's Equalities Group on 27 th February.	JM	Yes – Update 6.4.14.
6.4.14	0.7	Updated with engagement programme results and new projected grant spend figures for 2014/15. Circulate to Co-Production Panel.	JM	Yes – Update 2.4.14 & 6.4.14
22.5.14	0.8	Updated to show 5 grant streams to be created rather than 4 and that the Panel had 5 representatives, not 6.	JM	Yes – Update 22.5.14
17.6.14	1.0	Revised to bring the whole paper up to date rather than showing chronological revisions.	JM	-

Section A: Introduction

1. Title of policy, procedure or function being assessed

Proposals for the Review of Midlothian Council Grants Process (taking place in 2013/14), including stakeholder engagement.

2. Divisions/organisations/groups involved in doing this Equality Impact Assessment

Council representatives from:

- Education (Community Learning & Development).
- Adult & Social Care
- Property & Facilities Management (Sports & Leisure)
- Communities & Economy (Regeneration & Social Policy)

- Children's Services (Performance & Planning)
- Finance & ISS (Financial Services)

Representatives of the voluntary sector on the Co-Production Panel.

3. Date started:

18 December 2013

Date completed:

13 June 2014

Section B: Information

1. Please describe the Policy, Procedure or Function you are impact assessing

The Review has 4 objectives:

1. To establish a consistent process for grant allocation and monitoring.
2. To identify resources and define clear criteria for grant allocation and monitoring aligned with the Single Midlothian Plan priorities and outcomes.
3. To incorporate relevant recommendations arising from the Internal Audit of Following the Public Pound.
4. To develop an approach to forming a co-production panel

The review has been undertaken in a co-productive way, harnessing the experience of a variety of stakeholders, to achieve better outcomes and buy in.

2. What information and consultation data do you have to inform your assessment? What does it tell you?

The Project Definition Document sets out the overall approach to the Review. This includes a stakeholder matrix and communications plan. There is a Terms of Reference and draft Work Programme for the Co-Production Panel. The draft Work Programme includes an action to conduct a stakeholder survey.

Data relating specifically to equalities groups is described below:

- There is a budget spreadsheet which shows the voluntary sector organizations and activities which are grant funded by Midlothian Council. This includes a wide range of groups or activities which relate to one or more of the equality target groups e.g.
 - Age: young people or older people
 - Sex: domestic violence work with women
 - Disabilities: disabled clubs
 - Engagement with equality target groups e.g. the Midlothian People's Equality Group.
 - Tackling poverty e.g. Welfare Reform work.
- Information has been gathered about the purpose of specific grants across the Council e.g. the Fairer Scotland Fund has three aims, one of which is to increase employability skills particularly for 16 – 25 year olds.
- Information has been gathered about other grants available to voluntary sector organisations in Midlothian. These include grants which have equalities focus such as Big Lottery Fund Young Start strand which is aimed to support young people.

- The Co-Production Panel includes representatives of the voluntary and community sector and council/partner officers with experience/skills/knowledge of grant funding and how it is used.
- A survey was distributed to approximately 250 voluntary sector organisations as well as community planning partners.
- A workshop was held with Midlothian People's Equality Group. The group considered the question 'How can we ensure that equalities is embedded in the grants process?'

It is likely that the grants process will change considerably as a result of this review, resulting in new grant streams and new criteria. This may mean changes or reductions in funding to groups which are currently funded, or that new groups receive funding. One of the objectives is to align grant streams with the Single Midlothian Plan priorities and outcomes. The process of developing the Plan, including public consultation, is subject to Equality Impact Assessment. The consultation process includes, for example, use of the Citizens' Panel which is a representative sample of Midlothian's population. The objective of aligning grant streams with Single Midlothian Plan priorities should therefore have a sound equalities basis. However, it is still appropriate to check whether proposed changes to grant funds might have a disproportionate cumulative impact on one or more of the equality target groups.

Crude analysis of current grants shows that the majority of any current impact on equalities is in terms of poverty. There is also significant impact in age (older or young people), some impact on disability, sex (gender), and a small level of impact regarding sexual orientation and race. There is no direct impact from current grant funding on the protected characteristics of religion/belief, pregnancy, gender reassignment or marriage.

The Co-Production Panel has proposed replacing current grant streams with 5 new streams. High level analysis suggests the potential implications of this change would be to increase the impact in terms of age and reduce the impact for all other characteristics which currently receive funding. There would be no change for characteristics such as religion/belief which receive no current funding. Overall there would be a decrease in equalities impact, and a missed opportunity to address positive impact on those groups currently not benefiting from grant funding. It should be noted that this high level analysis has been developed using a fairly crude tool of associating each current grant with only one of the proposed grant streams (e.g. 'Developing communities' and only one of the equalities characteristics (e.g. age). This association could be argued to involve different grant streams or equalities characteristics. The tool also doesn't take into account the detail of exactly how the grant is used.

3. Do you need more information or more consultation/engagement data?

- Do you need anything more:
 - to do this Equality Impact Assessment (EQIA)
 - to monitor or assess, in future, the impact of the policy/procedure or function you are EQIAing on people with different equalities characteristics
- Lack of data is not a sufficient reason to conclude there is no impact. It is insufficient to state that a policy will affect everyone equally without having considered the different barriers some people may encounter.

17.6.14: Proposals have been developed for Council informed by the information described in this document, and actions are outlined in section 9. No further information is required at this stage. However, in order to assess actual equalities impact, it is suggested that the application form/criteria for awarding grants include equalities information (see section 9).

Section C: Assessment

Midlothian Council equality impact assesses on **all** of the characteristics in the shaded area below, so you should consider all of these in your assessment. If you want you can consider other groups as well.

Race (this includes ethnic or national origins, colour and nationality)

Disability (e.g. physical disabilities, sensory impairments, learning disabilities, mental health conditions or long-term illnesses)

Sex(male/female)

Age (all ages)

Sexual Orientation (gay man, gay woman/lesbian, bisexual, heterosexual/straight)

Religion or belief (including having no religion or belief)

Pregnancy and maternity (having just had a baby or being pregnant)

Gender reassignment or transgender status (a person who is proposing to undergo is undergoing or has undergone a process to change their sex)

Marriage and Civil Partnership

People experiencing poverty or at risk of poverty: (poverty may be simply defined as not having enough money to meet one's basic daily needs or to have the things that most people in the UK take for granted).

As you answer questions 7i. to 7iv. over the page:

a) Think about the policy, practice or function you are assessing and

- people with the above characteristics
- people associated with them (e.g. a parent or carer)
- people mistakenly assumed to have the above characteristics

Remember to consider impacts on staff as well as communities and customers.
Continued.../

b) Consider whether the above people are likely to have different needs, or be affected in different ways by what you are doing/proposing. e.g.

- People may need, or benefit from, information provided in a particular format, like large print or easyread.
- A queuing system which relies on people standing for long periods will make it very difficult for some people to use the service.
- Charging more for a service is likely to affect people from several of the groups in the shaded area above, as on average they have a lower income.
- Targeting an area of high poverty could leave people experiencing poverty outside the area even worse off in comparison

c) Consider the General Equality Duty requirements to pay due regard to the need to:

- eliminate discrimination, victimization, harassment or other local conduct that is prohibited under the Equality Act 2010 in relation to the

characteristics listed in shaded area at the top of this page (except poverty)

- advance equality of opportunity between and foster good relations between people who share a characteristic in the shaded area and those who do not (except marriage and civil partnership and poverty)

7i. Note any positive impacts on the above equalities groups

As described in section 2 above, alignment of the grants process with the Single Midlothian Plan will ensure that grant funding follows the same priorities as all Community Planning Partnership resources. As the Plan should be subject to equality impact assessment, this should provide a sound equalities basis for the grants process. For example, a key priority area is Early Years, Early Intervention and Child Poverty, which relates to age and poverty. We have not previously consulted regarding the process of grant application and monitoring across the Council so this review provided an opportunity for equalities groups to ensure that processes meet their specific needs.

There is the potential that the current proposal for 5 replacement grant streams would have a positive impact in terms of age. This high level analysis also suggests that the proposed grant streams would have a higher correlation with areas of strategic focus from the Single Midlothian Plan (particularly early years & early intervention and economic growth). However, there would be less correlation across the 5 themes of the Plan.

The stakeholder survey results have been analysed according to those respondents who noted that their organisation's work is directed at one or more equalities client group. Comments on positive implications included more positive and transparent understanding of the way funds are allocated, targeting areas in most need and enabling more people to access a full range of services.

7ii. Note any negative impacts on equalities groups

As described in section 2 above, there may be cumulative negative impact on specific equalities groups:

There is a potential negative impact on all equalities-related funding (except age) and a missed opportunity to consider funding for equalities groups which currently receive none. The MPEG consultation suggests that there may be equalities groups who are unaware of the grants available or would have difficulty accessing them. It was also queried whether all religious groups are currently unable to apply for grants, which could be used to foster good relations.

The stakeholder survey results were analysed according to those respondents who noted that their organisation's work is directed at one or more equalities client group. There was less agreement with the proposed grant streams by equalities respondents. Key issues primarily concerned where key areas of work would fit into the grant streams and whether significant services relating to poverty, mental health and disabled people would continue.

As a result of this feedback and analysis, the actions described in section 9 were taken forward.

7iii. How significant would this negative impact be, and what kind of numbers would be affected?

The extent of the impact is unclear, particularly because the analysis used a fairly crude tool to associate current grants with equalities impact. It should be noted that voluntary sector organisations were contacted in December 2013 with a brief explanation of the project, including noting that the review is taking place in the context of significant financial pressures and that savings would be required by the financial year 2015/16. Organisations have therefore been provided with an early indication of potential change.

7iv. Note any opportunities for making a positive impact on equalities groups.

There are currently equalities groups which do not appear to benefit from grant funding. The stakeholder survey results were analysed according to those respondents who noted that their organisation's work is directed at one or more equalities client group. When asked how the Council and community planning partners can best support organisations through coming changes to the grants system, responses primarily included well-timed communication, training and support. MPEG suggested a number of actions to address potential inequalities (see 9 below).

Section D: Actions and Outcomes

Questions 8 and 9 below ask about actions which have been taken, or will be taken **as a result** of this Equality Impact Assessment (EQIA). Any pre-existing actions should be included in earlier sections.

8. Note any actions you will be taking as a result of this EQIA:

Think about what you can do to:

- minimise or remove any negative impacts, and
- maximise the opportunities for positive impacts

All actions have been completed or are underway (see section 9).

9. Please note any actions you have already taken as a result of this EQIA here.

1. We developed the approach to the Co-Production Panel to ensure it includes cross-representation of the voluntary sector and council/partner officers with appropriate experience.
2. We analysed current grants by equalities impact. We analysed the equalities impact of the Single Midlothian Plan themes i.e. if grants were to be further aligned with the themes, what would the impact be?
3. We delivered a stakeholder engagement exercise including equalities input. We analysed survey responses by organisations associated with equalities groups.
4. The engagement programme also included a workshop with the Midlothian People's Equality Group. The group considered the question 'How can we ensure that equalities is embedded in the grants process?' The following actions were agreed as a result of the workshop, all of which are either completed or in train:
 - Actively encourage equalities groups to apply for grants (*add to process*)
 - Provide additional support for equalities groups to complete applications. (*add to process*)

- Provide easy-read versions of the application form and guidance and any other materials. *(add to application form)*
 - Application form should include asking applicant what steps they are taking to engage equalities minorities and to tackle discrimination and check their constitution position on equalities. *(add to application form)*
 - Clarify the eligibility of religious groups to apply for funding, particularly regarding the duty to foster good relations. *(add to application guidance)*
5. We revised the detailed proposals for replacement grant streams to take into account this impact assessment.
6. We explored mechanisms of support to organisations which cannot access grant funding in future and developed an Integrated Package of Support.

10. How will you track/monitor that the actions you mentioned in 8. have been achieved?

e.g. by adding them to a work plan, service plan etc.

In relation to the actions in item 9 which are in train, these will be monitored via the project plan.

11. If you have decided not to take any action please note why this is, and any justification, here.

A significant negative impact, even if it affects only a small number of people, should be addressed.

Not applicable.

12. Is a more detailed assessment recommended?

No, a more detailed assessment is not recommended.

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