

Equality Impact Assessment

The Council is required (under the Equality Act 2010) to consider the impact that any changes in any policy or procedure (or the creation of a new policy or procedure), will have on people with protected equality characteristics. The Council also has additional general duties to ensure fairness and to foster good relations. Therefore, a timely Equality Impact Assessment should be made before a decision is taken on any relevant change (i.e. that affects people with a protected characteristic).

1 Details

1.1. What is the name of the policy / service in question?

Strategic Equality Plan 2020-24

1.2 What is the purpose of the policy / service that is being created or amended? What changes are being considered?

The purpose of the Plan is to reduce inequality between people with protected characteristics and people without those characteristics in accordance with the Equality Act 2010 and the Cabinet's wishes.

1.3 Who is responsible for this assessment?

Delyth G Williams, Policy and Equality Officer

1.4 When did you commence the assessment? Which version is this?

Commenced 27 February 2019
2nd version commenced 26 September 2019
3rd version commenced 11 February 2020

2) Action

2.1 Who are the partners it will be necessary to work with to undertake this assessment?

- Equality Core Group
- The public, especially people with particular protected characteristics
- The Cabinet and Elected Members of Gwynedd Council.

2.2 What steps have you taken to engage with people with protected characteristics?

Two initial sessions were held with the Equality Core Group. The draft Plan represented the Council's response to their observations. A further discussion was held with the Equality Core Group on 16 January 2020.

A consultation was undertaken with the general public between 16 December and 7 February through a paper questionnaire (including easy-read) and on-line. Around 150 organisations were notified of the consultation. A meeting was held with two Learning Impairment Self-Advocacy groups where everyone was supportive of the Objectives and where the easy-read questionnaires were distributed. Paper copies were sent to the Older People Council. We tried to arrange a meeting with the LGBT+ Youth Club, but this was not possible. 190 responses were received.

2.3 What was the outcome of the engagement?

At the initial meetings the Equality Core Group raised many matters that needed addressing in the following areas:

Education
Health and Social Services
Justice and Community Safety
Participation
Living standards
Employment

These matters are being addressed by the relevant services.

At the January meeting they were supportive of the direction of the plan and agreed with the Objectives, but they had observations on each objective. Some comments related to the wording and format of the Plan and we have attempted to respond to those. Some matters were operational in nature, which are being passed on to the relevant service. Also:

Objective 1

- It is important to ensure that the right people provide the training
- Need something every 2-3 years but it should not be a 'tick box' exercise.
- Need to raise awareness of 'invisible' disabilities
- Need to accept the 'social model'
- A list of Elected Members' training attendance should be published (similar to

- attendance in the full Council / meetings)
- Improve people's understanding that everyone has characteristics
 - Understanding as opposed to awareness of equality
 - The training must be tailored
 - Train people so that they can teach others about access etc.
 - Ensures resources
 - Secure feedback e.g. mystery shopper

Objective 2:

- Need to improve understanding of people's real needs - not a 'tick box' exercise
- Learning from others e.g. BCUHB

Objective 3

- Raise awareness of the importance of an impact assessment - raise it to the same status as Safety Assessments.
- Could we have a designated person who is responsible for this in every department?

Objective 4

- Need to look at what obstacles are causing a pay gap e.g. do we need a more flexible 'flexi' system?
- Disabled people might not be able to work full-time

Objective 5

- Why is the 'Disability Confident' Scheme not happening until September 2022?
- Improving access in general
- Remember the Access to Work Scheme

Of the 190 responses received to the questionnaire, most were supportive of the 5 Objectives. The details are as follows:

Do you agree with Objective 1? Yes 179, No 11

The reasons given for saying "no" were: the costs of the training, everyone should already be operating like this, considering the Welsh language as part of Equality could be unfair to those who are not fluent in Welsh. Two people said that equality is too much work / is irrelevant.

Do you agree with Objective 2? Yes 182, No 8

The reasons given for saying "no" were: concern about the privacy and sensitivity of the characteristics, and that we should already have the information. One person said that only certain people in powerful jobs were safeguarded.

Do you agree with Objective 3? Yes 179, No 11

The main reason for stating "no" here was that it is a waste of time and money (a tick box exercise rather than actual work). Some noted that there was not enough information to answer the question and one person thought that the outcome would not achieve the vision of the Equality Act 2010.

Do you agree with Objective 4? Yes 175, No 15

The main reason here was the cost, with some concerned that it might lead to job losses which would impact on a service or limit the employer's choices. Some people mentioned equal pay for the same jobs and believed that this should already be happening. Two people stated that the pay gap did not exist and one person said that the pay gap must be removed, and not just reduced.

Do you agree with Objective 5? Yes 171, No 19

There was concern that this objective would lead to positive discrimination. Three people wanted to secure jobs for local people and two felt that we need to note how we would achieve the objective.

Those who completed the questionnaire were given the chance to answer two additional questions also:

Is there anything else that the Council should consider including in the Equality Plan 2020-2024?

This question received 60 responses. The main messages were:

- The need to think about disabled people – issues surrounding physical access to buildings so as to allow disabled people to live independently. Need to include disabled people when doing the work in order to have an understanding of needs. Remember that disability is not confined to wheelchair users only. Need to consider the needs of people with varying physical impairments. Identify hidden impairments, especially in considering accessible toilets, using the phone. Pay for disabled people.
- Comments about the Plan and the questionnaire in general – Have included everyone. Unhappy with the format of the questionnaire. Ensure that it confirms what is expected in the Equality Act 2010. A good start bearing in mind the financial constraints, but there is more to be done. Need to revisit the Plan after receiving the 2022 Census results in order to revise it as required. Too much focus on the Council staff instead of the people of Gwynedd – where is the equality for young people and older people in it? Need to ensure that it will still be possible to deliver the plan whatever the political and social situation may be.
- Language – some of the respondents felt that the inclusion of the Welsh language as a characteristic discriminated against those who do not speak Welsh/learners and ethnic minorities. A feeling that those who do not speak Welsh are marginalised from job opportunities within the Council. Want to see English-medium education opportunities.
- Need to be more aware of the obstacles faced by lesbian, gay, bisexual and trans people.
- Training – management courses for female employees, specialist courses for managers to support the objectives, help employees to spread equality throughout the population of Gwynedd, teach about equality in schools.
- The plan is too vague - need to be able to measure and identify the success of the Objectives. Also, what is the cost?
- There is no need for such a Plan, do proper work in its place. A waste of money that will not help the people of Gwynedd.
- Pay gap – need to identify the reasons behind the pay gap, recognise the possibility that it might be reduced 'artificially' by gender self-identification
- Rural matters – inequality of services and opportunity between rural and urban areas, the conditions of the roads.

The following were also noted

- Activities for young people in deprived areas
- Look at the make-up of groups and committees from the perspective of equality characteristics
- An opportunity for older people to share their experience with young workers.
- The need to address poverty amongst older people
- People who wish to return to Gwynedd have to pay more Council tax

- Equality between areas in Gwynedd
- How to ensure that the people of Gwynedd understand equality matters?
- Keep matters such as planning private, if there is a risk that people will come to know about the person's equality characteristics, and provide an accessible method of contact.
- Consider local people first
- More flexibility within the workforce
- The needs of people who do not use the internet to have paper versions – send copies to every house
- Measure the use of public services by minority groups
- The importance of public transport for everyone in order to attend health appointments, shop, socialise, volunteer etc.
- Remember that equity is just as important as equality and that there are 9 characteristics.
- Consider the effect of a decision on men and women
- A question about a Community Council

Please note any further comments:

We received 39 observations here

- General comments on the plan - Need a detailed action plan with measurable targets. A hope that work has already been done, especially on Objectives 1 and 2. We welcome the emphasis on collecting data and information in order to have a firm basis, it is tick box exercises that cost too much. Need balance to ensure that it is not done excessively. I welcome the plan - an important area. It is achievable. The Council is developing. Not promoting some characteristics more than others.
- Language – concern that the standard of English is compromised due to Welsh-medium education and is preventing young people from securing meaningful work. A belief that the Welsh language should not be a characteristic, and need to ensure that there are no restrictions to people accessing services in full through the medium of English.
- Elected Members – The Cabinet should be 50:50 men and women, and arrangements need to be changed completely to ensure that there is fairness for women in the workplace. Councillors should remember the words of Martin Luther King, 'It's not the colour of their skin, but the content of their character' as a metaphor for dealing with people in general. Look at Councillors' pay.
- A need to ensure that people can submit comments, complaints etc. when they want, by providing accessible ways of doing so. Ensure that they are duly addressed, and solutions provided.
- Better support for LGBT+ young people e.g. fund the GISDA group and challenge homophobia in general.
- More information needed on the feasibility of delivering this e.g. training.
- A question about a Community Council
- Need a Disability Equality Officer
- How will Brexit affect equality?

2.4 On the basis of what other evidence do you operate?

Looking at the matters that were identified by the Equality Core Group during the initial meetings, most of them are operational matters that belong to the Departments. It was decided

that the best way of addressing these would be to take a step back and look at the Council's internal systems to ensure that we are making a difference throughout the Council's work, and not just the identified issues. Any operational matter from the consultation e.g. transport, will be addressed in the same way.

The main sources of information that were used are:

['Is Wales fairer? 2018'](#) (the Equality and Human Rights Commission's latest state-of-the-nation report)

A Report by the Equality and Human Rights Commission on Welsh Authorities' response to the General Duty

Regional Data Document

Information collected from previous surveys

[The Gwynedd and Anglesey Public Services Board's Well-being Assessment](#)

2.5 Are there any gaps in the evidence that needs to be collected?

There are gaps in the data that is available locally, probably due to low numbers. We will need to see whether it is possible to access or collect this information.

3) Identifying the Impact

3.1 The Council must give due attention to the impact that any changes will have on people with the following protected characteristics. What impact will the new policy/service or proposed changes have on people with these characteristics? You are welcome to add other characteristics if you wish.

Characteristics	What type of impact? *	In what way? What is the evidence?
General	Positive	<p>The aim of the Plan is to ensure that awareness regarding the needs of people with protected characteristics is deeply-rooted within the Council's work. Since everyone has characteristics such as race, age and gender, this will ensure that services are improved for all the people of Gwynedd. Having said this, we will need to focus more on some cohorts than others, and they will therefore benefit more.</p> <p>We are conducting Equality Impact Assessments on the various projects within the Plan, and the work on engagement and collecting information which is noted in the Plan will be central to this.</p>
Race (including ethnicity)	Positive	Some respondents to the consultation have identified some issues of race relating to the Welsh language. They feel that

		<p>the Council's language policy discriminates against non-Welsh speaking people from minority groups (i.e. most of them being immigrants either from England or from other countries).</p> <p>We acknowledge that this is a concern for them, but we also note our statutory duty to give an equal status to, and protect, the Welsh language as a minority language in Wales.</p>
The Welsh language	Positive	<p>There was some objection to the decision to consider Language as part of Equality.</p> <p>We acknowledge that this is a concern, but on the other hand, given that 65% of the population of Gwynedd are Welsh speakers, the Council is operating a Language Policy which ensures that "All residents of the county can use the Council's services through the medium of Welsh and English, and that firm actions are taken to ensure that the user's choice of language is noted and respected at all times". The ability to implement this policy consistently across the whole county, and ensure that individuals can access a service in Welsh if they wish (in accordance with the requirement under the Welsh Language (Wales) Measure 2011 means that consideration must be given to the Welsh language when recruiting and developing services.</p> <p>It must be remembered that any Welsh speaker who is appointed to a post will necessarily be able to provide that service in English also.</p> <p>The Welsh language will be given consideration alongside the other factors. See also Race, above</p>
Disability	Positive	<p>Matters relating to disability have been identified (by the Equality Core Group and the respondents to the questionnaire). They will be addressed as operational matters within the Services and as part of the work on the Action Plan.</p> <p>The Plan will be positive for people with this characteristic, as is highlighted in General (above).</p> <p>It was noted that the pictures in the document were too bright, therefore we will provide a black and white version as well as other formats.</p> <p>The Council is accepting the social model of disability.</p>
Gender	Positive	<p>Women's contribution in the world of work and as representatives has been raised by the Equality Core Group and the respondents to the questionnaire. This will be further addressed when implementing the Action Plan. The Plan will be positive for people with this characteristic, as is highlighted in General (above).</p>
Age	Positive	<p>Matters relating to age have been identified and will be addressed within the Services and when implementing the Action Plan. This will be addressed within the impact assessments on the projects. The Plan will be positive for people with this characteristic, as is highlighted in General (above).</p>

Sexual orientation	Positive	Matters relating to sexual orientation have been identified by the Equality Core Group and the respondents to the questionnaire. They will be addressed within the Services and when implementing the Action Plan. The Plan will be positive for people with this characteristic, as is highlighted in General (above).
Religion or belief (or non-belief)	Positive	One respondent to the consultation identified some religion matters relating to the Welsh language. This person felt that the Council's Language Policy excluded non-Welsh speaking people which could include people from some particular religions. We would argue that this is a race issue, and not religion. The Plan will be positive for people with this characteristic, as is highlighted in General (above).
Gender reassignment	Positive	Matters relating to gender reassignment have been identified by the Equality Core Group and the respondents to the questionnaire, and will be addressed when implementing the Action Plan. The Plan will be positive for people with this characteristic, as is highlighted in General (above).
Pregnancy and maternity	Positive	The Plan will be positive for people with this characteristic, as is highlighted in General (above).
Marriage and civil partnership	Positive	The Plan will be positive for people with this characteristic, as is highlighted in General (above).

3.2 The Council has a duty under the Equality Act 2010 to contribute positively to a fairer society through advancing equality and good relations in its activities in the fields of age, gender, sexual orientation, religion, race, transgender, disability and pregnancy and maternity. The Council must give due attention to the way any change impacts on these duties.

General Duties of the Equality Act	Does it have an impact?*	In what way? What is the evidence?
Eliminate unlawful discrimination, harassment and victimisation	Yes	The evidence of the Equality Core Group has shown that the members have concern about some of our services, and some comments on operational matters were received in the responses to the questionnaire. If implemented correctly, the Action Plan will deal with this because it will improve the way we work. We will collect information which will inform us if discrimination, harassment or victimisation is occurring so that we can take action against it.
Advance equal opportunities	Yes	The Plan's intent is to work towards ensuring fairness for everyone. The evidence of the Equality Core Group and the responses received shows that we have work to do to achieve this. We will therefore collect further evidence, in accordance with the Actions in the Plan, and act on the result. We also have Action Points which make a start on the work.

Foster good relationships	Yes	Good relations between people who share a protected characteristic and those who do not comes from ensuring fairness for everyone. By delivering the Action Plan, and taking positive action towards some characteristics, we will ensure that our services are fair.
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4) Analysing the results

4.1 Is the policy therefore likely to have a significant, positive impact on any of the protected characteristics or the General Duty? What is the reason for this?

The aim of Gwynedd Council's Strategic Equality Plan is to have a significant, positive impact on the lives of the people of Gwynedd who use our services, and also our staff. We have used the relevant observations that were received during the engagement to improve the Plan. The operational matters will be passed on to the services.

4.2 Is the policy therefore likely to have a significant, negative impact on any of the protected characteristics or the General Duty? What is the reason for this?

No significant negative impact has been identified.

4.3 What should be done?

Select one of the following:

Continue with the policy / service as it is robust	X
Amend the policy to remove any barriers	
Suspend and remove the policy as the detrimental impacts are too great	
Continue with the policy as any detrimental impact can be justified	

4.4 If you continue with the plan, what steps will you take to reduce or mitigate any negative impacts?

The response to the Objectives by the Core Group and from the questionnaire has been very positive. The comments provided by some has shown us that the wording of some Objectives and activities was not clear enough, particularly Objective 5, and we have changed that accordingly. We will pass any observations that are operational in nature onto the right services and include them as part of the engagement (Objective 2)

4.5 If you are not taking any further action to remove or reduce the negative impacts, please explain why here.

Not applicable.

5) Monitoring

5.1 What steps will you take to monitor the impact and effectiveness of the policy or service (action plan)?

The Plan will be presented to the Council Cabinet for approval in March 2020.

We will be monitoring regularly, especially as the results come in from any work carried out to collect evidence. We will also produce an Annual Report early on in every financial year to report on any progress from the previous year. The results of the 2021 Census will be useful.

We will produce a Strategic Equality Plan every four years.