

Assessing the Impact on Equality Characteristics, the Welsh language and the Socio-Economic Disadvantage

The Council is required (under the Equality Act 2010) to consider the impact that any change in any policy or procedures (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 relationships. Therefore, a timely assessment should be made before any decision is taken on any relevant change (i.e. that affects people with a protected characteristic).

The Council is required, under the requirements of the Welsh Language Standards (Section 44 of the Welsh Language (Wales) Measure 2011), to consider the impact that any change in policy or procedure (or creating a new policy or procedure), will have on opportunities for people to use the Welsh language and to ensure that the Welsh language is not treated less favourably than English. Therefore, this document ensures that these decisions safeguard and promote the use made of the Welsh language.

Since 1 April 2021, the Council has a duty to give due attention to addressing socio-economic disadvantage in strategic decisions. See below specific questions that address this duty, which asks us to consider how we reduce socio-economic disadvantage in strategic decisions.

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's implementation is to reduce inequality between people with protected characteristics and people without those characteristics in accordance with the duty under the Equality Act 2010 and the Cabinet's wishes.

When the Equality Plan was prepared, we were unaware of what was to come, i.e. the Covid-19 crisis. It must now be acknowledged that things have changed, and that timetables have slipped as services have closed down or faced different demands on their time. We also have to consider very different ways of implementing the objectives

which, in turn, has a further impact on the timetable. The 2020-21 Annual Report provides details on this

Something that has become increasingly apparent to everyone because of the virus is the importance of considering the needs of people with different characteristics. We must ensure that we act appropriately in order to include everyone as we proceed with the Objectives.

Another factor that has arisen during this period is the Black Lives Matter protests. We must ensure that we as a Council look at our procedures in order to ensure fairness for all. Welsh Government is also consulting on a Race Equality Action Plan and Gwynedd Council appreciates the opportunity to look at our procedures and ensure fairness for people from minority ethnic groups.

This Socio-Economic Duty came into force at the beginning of April, so it is included in this Equality Impact Assessment. This is particularly important because of the economic problems that are emerging as a result of the pandemic. Brexit will also affect this duty.

This is the assessment that provides an overview of the Plan as a whole. Separate impact assessments have been developed for each of the Objectives and they are being updated as needed.

1.3 Who is responsible for this assessment?

- Dewi Jones, the Council's Business Support Manager and Project Leader for Plan Implementation
- Delyth G Williams, Policy and Equality Officer, Project Manager and Objective 3 Lead
- Carey Cartwright, Organisational Learning and Development Manager and Objective 1 Lead
- Siôn Gwynfryn Williams, Communication and Engagement Manager and Objective 2 Lead
- Eurig Williams, Human Resources Advisory Services Manager and Objectives 4 & 5 Lead

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

This is the 5th version and it is being made in July 2021

- The work was commenced on 27 February 2019, when an initial draft was prepared

- Version 2 was commenced on 26 September 2019 in order to prepare the Plan for engagement.
- Version 3 was commenced on 11 February 2020. This is the version submitted to the Cabinet, in order for them to make a final decision to approve the Plan.
- The assessment was amended further in July 2020 (Version 4). This was the first amendment when implementing, but more importantly, this is the first amendment because of Covid-19, which has changed so much of our way of working.
- This version coincides with the making of the 2020-21 Annual Report, which is the first Annual Report in the four-year period which explains the unavoidable changes made due to the pandemic, and addresses Black Lives Matter and the Socio-economic Duty.

2) Action

2.1 Who are the stakeholders or partners whom we will have to work with to carry out this assessment?

- The Public, especially people with specific protected characteristics
- Organisations who support or represent people with specific protected characteristics, including the Equality Core Group
- The Council's Staff
- Cabinet Members and Elected Members of Gwynedd Council.

2.2 What steps have you taken to engage with people with protected characteristics, regarding the Welsh language or with communities (either due to location or due to need), who are living with a socio-economic disadvantage?

Two initial sessions were held with the Equality Core Group in order to form a draft plan. Then, a wider consultation was undertaken on the draft between 16 December and 7 February, through a paper questionnaire (including easy-read) and on-line. Around 150 organisations were informed about the consultation. A number of meetings were also held with two specific groups.

We are also using information from the Council's other consultations when moving forward.

2.3 What was the outcome of the engagement?

The Equality Core Group supported the direction of the plan, as did the responses to the consultation.

A number of useful observations were received as part of the consultations. As we move forward to implementation, we will consider the relevant comments to the various Objectives:

Objective 1

- It is important to ensure that the right people train
- Need something every 2-3 years but it should not be a 'tick box' exercise.
- Need to raise awareness of 'hidden' 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.
- Secure resources
- Secure feedback e.g. mystery shopper
- Need to be mindful of the costs
- This should be happening already
- Management courses for female employees
- Specialist courses for managers to support the objectives
- Help employees to spread equality throughout the population of Gwynedd.

Objective 2

- Need to improve understanding of people's real needs – not a 'tick box' exercise
- Learning from others e.g. BCUHB
- Concern about the privacy and sensitivity of the characteristics – will the Council deal with this appropriately?
- Being aware of prior knowledge
- Measure the use of public services by minority groups

We will also use the information we received about various Council services during the engagement as a starting point for consultation.

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?
- It should not be a tick box exercise

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
- We must ensure that this does not ultimately cause job losses
- Need to identify the reasons behind the pay gap
- Recognise the possibility that it might be reduced 'artificially' by gender self-identification

Objective 5

- Why is the 'Disability Confident' Scheme not happening until September 2022?
- Improving access in general
- Remember the Access to Work Scheme
- Want to ensure jobs for local people
- The right person should be obtained for the job, regardless of their protected characteristics
- Need to pay disabled people, rather than getting them to do voluntary work
- A feeling that those who do not speak Welsh are marginalised from job opportunities within the Council.
- Looking at the make-up of groups and committees in terms of equality characteristics
- An opportunity for older people to share experiences with younger employees
- More flexibility within the workforce

In general

- 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
- Equality between areas in Gwynedd
- Remember that equity is just as important as equality and that there are 9 characteristics. Not promoting some characteristics more than others.
- A need for a detailed action plan with measurable targets.
- How will Brexit affect equality?

2.4 On the basis of what other evidence are you acting?

The main sources of information used in drawing up the Equality Plan are ['Is Wales fairer? 2018'](#) (the latest state of the nation report by the Equality and Human Rights Commission). This is as important as we move forward.

The Regional Data Document provides us with more local information.

The Report of the Equality and Human Rights Commission on the response of Welsh Authorities to the General Duty

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

Information about the impacts of Covid-19 e.g.

[COVID-19 BAME Socio-economic Sub Group Report](#)

Evidence in Welsh Government's consultation document on the Race Equality Action Plan.

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

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

We are also gather information on people's views of our services by implementing Objective 2.

3) Identifying the Impact

3.1 The Council must duly address the impact that any changes will have on people with the following equality characteristics. What impact will the new policy/service or the changes in the policy or service have on people with equality characteristics? There is also a need to consider the impact on the socio-economic disadvantage and on the Welsh language.

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. As everyone has characteristics such as race, age and gender this will ensure that services are improved for all of the people of Gwynedd. Having said that, more attention will need to be given to some cohorts than others of course, and so they will benefit more.</p> <p>We will conduct Equality Impact Assessments on the different projects within the Plan and the consultation and information-gathering work noted in the Plan is at the heart of this.</p>

		<p>The changes to our way of living and working due to Covid-19, particularly the lack of meetings and the opportunity to meet with people, will make it more difficult for us to contact and engage with individuals. It was inevitable for us to have to change our methods of working and change our timetables (as noted in 1.2, and which is discussed in greater detail in the 2020-21 Annual Report), which will mean that we will take more time to gather the information and make the changes. This could lead to a delay before implementation, which will have an unavoidable impact on users with protected characteristics. We have assessed whether the Objectives, or the actions, needed to be changed, as published in the Equality Plan, because of the issues arising during this period. We feel that our Objectives and actions remain valid. The information we gather during the engagement will be very useful, moving forward, and the work in the other four objectives, impact assessment, training and employment, is very important. We will adapt the work in line with the latest data.</p>
<p>Race (including nationality)</p>	<p>Positive / negative / none</p>	<p>Some respondents to the consultation have identified some race matters relating to the Welsh language. It is felt that 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> <p>The effects of catching Covid-19 is much worse for some people, particularly black people or people from Pakistani or Bangladeshi origin. We ensure that the methods we use when doing the work take this into account.</p> <p>Brexit will also affect this characteristic, including more hate crime.</p> <p>The Black Lives Matter movement places an additional emphasis on this characteristic and we welcome Welsh Government's campaign to address this through its Race Equality Action Plan.</p> <p>Welsh Communities have felt under pressure due to the difference in the restrictions across UK nations</p>

		<p>and then due to the situation of the housing market. This has caused tensions, which could be perceived as racial tensions.</p>
Disability	Positive	<p>Disability-related issues have been identified in the consultation. We will address them 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 promised to provide a black and white version as well as other formats. This had not happened when the Plan was published as this was at the beginning of the Lockdown and there were other work priorities because of Covid-19.</p> <p>The Council is accepting the social model of disability.</p> <p>Covid-19 is a major factor to consider with this characteristic as people with particular conditions are affected much more if they catch Covid-19. The Covid-19 crisis has affected the Council's plans to work in different ways, but we intend to operate like this as we move forward.</p> <p>We must also acknowledge that the crisis has affected disabled people in a number of different ways. This has resulted in loneliness, having to receive services in alternative ways and major anxiety.</p> <p>The crisis has also led to an increase in mental health problems in people within the community in general. This will place major pressure on our services moving forward, and our engagement work will be of assistance to identify how this affects people.</p>
Sex/Gender	Positive	<p>The contribution of women in the working world and as representatives has been raised in the consultation. This is addressed further in the implementation of the Action Plan. The Plan will be positive for people with this characteristic, as highlighted in General (above).</p> <p>Statistics indicate that women are more likely to undertake caring roles, whether for children or for disabled or older adults. The crisis has increased this a lot. We will look for the effects of this as we move forward.</p>

Age	Positive	<p>Age-related issues have been identified and we are addressing these issues within the services and when implementing the Action Plan. The Plan is positive for people with this characteristic, as is highlighted in General (above).</p> <p>Covid-19 has a major impact on this characteristic. Older people are much more likely to be affected worse, compared with young people. They are also less likely to use technology such as social websites, and an alternative way of contacting them will be needed. Therefore, this has caused loneliness, anxiety and mental health problems and we will be looking for the impacts of this moving forward.</p>
Sexual orientation	Positive	<p>Matters relating to sexual orientation have been identified in the consultation and we will address them 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).</p> <p>There is nothing to add regarding Covid-19 at present</p>
Religion or belief (or non-belief)	Positive	<p>One responder to the consultation has identified that some religion issues relate to the Welsh language. The responder felt that the Council's language policy excluded non-Welsh speakers, which could include people from some religions. We would argue that this is a race matter, and not a religion matter. The Plan will be positive for people with this characteristic as highlighted in General (above).</p> <p>There is nothing to add regarding Covid-19 at present.</p>
Gender reassignment	Positive	<p>Matters relating to gender reassignment have been identified in the consultation. This will be addressed further when implementing the Action Plan. The Plan will be positive for people with this characteristic, as is highlighted in General (above).</p> <p>We assume that people who wish to receive medical treatment have been affected as all types of treatments have been stopped over the past year.</p>
Pregnancy and maternity	Positive	<p>The Plan will be positive for people with this characteristic, as is highlighted in General (above).</p> <p>Pregnant or post-natal women during this period have been affected greatly by the fact that their partners</p>

		<p>have been unable to participate in full in the medical process. They have also experienced loneliness as they have not been able to mix with family, friends or professionals in the usual way.</p>
<p>Marriage and civil partnership</p>	<p>Positive / negative / none</p>	<p>The Plan will be positive for people with this characteristic, as is highlighted in General (above).</p> <p>There is nothing to add regarding Covid-19 at present.</p>
<p>The Welsh language</p>		<p>There was some objection to the decision to consider Language as part of Equality amongst some of the responders as they felt that it gave less equality to people who do not speak the language. 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. 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. Also, see Race, above.</p> <p>The period has reduced the opportunities that people have to use the Welsh language. Within the Council, some services were suspended for a period and have returned in different, more non-contact methods, which has affected this. An increase in the use of technology will also affect the use made of the Welsh language.</p>
<p>Socio-Economic Disadvantage</p>	<p>Positive</p>	<p>The evidence shows that the crisis has increased socio-economic disadvantage, particularly financial poverty, digital poverty and the impact of living in the countryside.</p>

		There will be a need to see how this affects people locally over the next period.
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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 duly address 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	<p>Evidence in the comments about operational matters expresses concern about some of our services. The Action Plan of the individual Objectives deals with this by playing their part to improve how we operate.</p> <p>We are in the process of gathering information that will inform us whether any discrimination, harassment or victimisation is happening, in order to act on it.</p> <p>The Black Lives Matter movement has highlighted further that hate crime and discrimination still exists, but this is not the only hate crime that is happening. Therefore, it is important that we consider this duty seriously when we consider the 5 Objectives separately.</p>
Promote equal opportunities	Yes	<p>The aim of the Plan is to work towards ensuring fairness for all. Evidence from our consultation shows that we have work to do to this end. Therefore, we are gathering further evidence, in line with the Plan's Action Points, and are implementing the outcome. Also, we have Action Points that are beginning the work.</p> <p>This need is even more critical due to Covid-19. We will need to ensure that our operational methods are suitable for all in the "new normal".</p>
Building good relationships	Yes	<p>Good relations between people who share a protected characteristic and those who do not comes from ensuring fairness for everyone.</p> <p>By delivering the Action Plan, and taking positive action towards some characteristics, we will ensure that our services are fair. This is particularly important because of the Covid-19 crisis, as it affects people in different ways.</p> <p>There is also additional work to be done when considering the Black Lives Matter movement and of</p>

		course, what has been said about hate crime is also important here.
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3.3 How does your proposal ensure that you work in accordance with the requirements of the Welsh Language Standards (Welsh Language (Wales) Measure 2011), to ensure that the Welsh language is not treated less favourably than the English, and that every opportunity to promote the Welsh language is taken (beyond providing bilingual services) and increase opportunities to use and learn the language in the community?

We will address this in the more detailed assessments on the 5 Objectives

3.4 What other measures or changes can you include to strengthen or change the policy / custom to have a positive impact on people's opportunities to use the Welsh language, and to reduce or prevent any detrimental impacts that the policy/practice can have on the Welsh language?

See 3.3

3.5 How does the proposal show that you have given due regard to the need to address inequality due to socio-economic disadvantage? (Please note that this relates to closing the inequality gap, rather than improving outcomes for everyone only).

The Plan is working to improve the deprivation gap by identifying the barriers faced by people with specific protected characteristics when involved with the Council, and then working to mitigate them. Work in Objective 5 to improve the diversity of our workforce, and work with partners to do so, will make a difference. Objective 4 ensures that we reduce any pay gaps, which will also help. Of course, doing better impact assessments (Objective 3) will ensure that our services are suitable for all, as will training our workforce (Objective 1). We will look at this in further detail in the individual impact assessments as we move forward.

3.6 What other measures or changes can you include to strengthen or change the policy / custom to show that you have given due regard to the

need to reduce disproportionate outcomes as a result of socio-economic disadvantage, in accordance with the Socio-Economic Act?

We will use the information we gather when moving forward with the work to identify any other measures or changes that will be highlighted and we will proceed to act on them.

4) Analysing the results

4.1 Is the policy therefore likely to have a significant, positive impact on any of the above? 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. It will also be necessary to consider additional factors such as Covid, Brexit and Black Lives Matter as we move forward.

4.2 Is the policy therefore likely to have a significant, negative impact on any of the above? What is the reason for this?

It is a shame that the timetable has had to slip as it has not been possible to act as soon as we had hoped. This will mean that it will not be possible to improve services within the expected timetable.

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 abolish the policy as the harmful impacts are too great	
Continue with the policy as any harmful impact can be justified	
No further steps at present, it is premature to decide, or there is insufficient evidence at present.	

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

Equality Impact Assessments on all objectives are positive at present; however, we will use them to identify any negative impact.

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

Not relevant

5) Monitoring

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

- We have created separate impact assessments for the 5 Objectives in order to gain a better understanding of the matters arising.
- We have also created Action Plans for the 5 Objectives and these are reviewed regularly by the Project Group. The Cabinet Member for Equality reviews them each quarter.