

Independent Living Fund Scotland

Equality Duty Action Plan

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1. Introduction

The Independent Living Fund Scotland (ILF Scotland) believes that no-one should be denied opportunities because of their race or ethnicity, a disability, their gender, or sexual orientation, their marital or civil partnership status, their age or religion, or due to any of the protected characteristics detailed in the Equality Act.

ILF Scotland will treat recipients, applicants and ILF Scotland staff equally and fairly. For staff, this commitment also extends to maternity status, working pattern, employment status, caring responsibility, and trade union membership.

ILF Scotland must comply with the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 and the specific duties designed to help Scottish public authorities meet the general duty. Regulation 4 of the specific equality duties requires that we base our Equality Outcomes on evidence, and involvement of equality groups.

The Public Sector Equality Duty regulates performance against equalities duties. From April 2020, ILF Scotland is required to report on the areas outlined below, every two years, apart from the Statement on Equal Pay, which is every four years. We also have a duty to publish diversity information about our board members. This report meets our general and specific duties under the Equality Act 2010 and outlines:

- Mainstreaming the Equality Duty in ILF Scotland
- Report on Progress
- Board Diversity Duty
- Employee Information
- Gender Pay Gap Information
- Statement on Equal Pay (covering sex only)

1.1 Background

The public sector equality duty came into force on 05 April 2011. The purpose of the duty is to ensure that public authorities consider how they positively contribute to a more equal society. It requires authorities to consider equality in all their functions, including decision-making, design, and delivery of services.

From 01 October 2012, the scope of the Act was extended to ban age discrimination, though this does not presently cover people under the age of 18.

The aim of the Equality Duty Action Plan is to demonstrate ILF Scotland's commitment to the Scottish Government's equalities agenda, mitigate the risk that equalities activities are not prioritised and align the activities with budgets and resources to cover short and medium-term objectives.

1.2 The General Equality Duty

Under the Equality Act 2010, public authorities are required to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct.
2. Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.
3. Foster good relations between people who share a protected characteristic and those who do not.

This duty is often referred to as “the three needs.” To comply with the duty, a public authority must have due regard to all three of these needs.

The Act explains that to meet the second need (advancing equality of opportunity), a public authority must consider the need to:

- Remove or minimise disadvantage suffered by people with certain protected characteristics, where these are different from the needs of other people.
- Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The Act also sets out that:

- Meeting different needs includes (among other things) taking steps to take account of disabled people’s disabilities.
- Fostering good relations means tackling prejudice and promoting understanding between people from different groups.
- Meeting the general equality duty may involve treating some people more favourably than others.

Who should be aware of the General Duty in ILF Scotland?

1.3 Board Members

Set strategic direction, review performance, and ensure good governance of the organisation. The Depute Director, Scottish Government, Health & Social Care, appraises the Chair of the Board against a Diversity Objective.

1.4 Senior Managers

Oversee the design, delivery, quality, and effectiveness of the organisation's functions.

1.5 Equality and Diversity Staff

Specific role in raising awareness and building capacity about the general duty. The Equality Lead in ILF Scotland is the Chief Executive Officer.

1.6 Communications Staff

Help ensure relevant equality information is available and accessible.

1.7 Frontline Staff

Need to be aware of how they can help to meet the needs of people with special characteristics.

1.8 Procurement

Need to be aware of how to build equality considerations into the organisation's supply chain. In ILF Scotland, anyone tendering a contract should be aware of the Equalities Obligation and what we expect of organisations that we contract with.

1.9 Line Managers

Need to consider and be aware of how they apply Equality Duty on a day-to-day basis with reference to organisational employment policy and practice.

2. Key ILF Scotland Documents

The primary function of ILF Scotland is to operate a discretionary fund providing financial awards to over 4,000 disabled people in Scotland and Northern Ireland to help them live independently. ILF Scotland adheres to a suite of key policy documents to support our recipients, applicants, and staff. The policy suite is updated on an ongoing basis to support the Scottish Government's strategic priorities.

The key references are:

- www.ilf.scot
- ILF Scotland Policies
- 2020-23 Strategic Plan
- 2020-23 Business Plan

2.1 ILF Scotland Policies

ILF Scotland recognises the need to consider whether and how the outcome and delivery of any proposed new or amended policy might impact on people, specifically, what relevance the policy might have to people with protected characteristics.

The policy development lead will carry out a 'screening exercise' to help determine if any proposed or amended policy will directly or indirectly affect people. They should then complete either an Equality Impact Assessment (EQIA) or the 'No EQIA required declaration.'

The policy lead must carry out the EQIA early, and as an embedded part of the policy development process, so that the assessment can shape, inform, and influence the policy proposals, and they should continue to revisit this assessment throughout the lifecycle of the policy.

2.2 2022-24 Strategic Corporate Plan

The vision set out in the Corporate Plan identifies the integral part played by ILF Scotland in supporting independent living for disabled people across Scotland and Northern Ireland, and how ILF Scotland can support individuals through its funding role.

2.3 2023-24 Business Plan

ILF Scotland will improve its evidence base by gathering information from recipients, applicants, and staff through the various use of equality monitoring forms, and where applicable, will use surveys, to strengthen its understanding of the needs and requirements of the disabled people the organisation supports.

This improved data will be reflected in enhanced information displayed in the Annual Corporate Report and online. Stronger management information will enable ILF Scotland to consider how it can better meet the general equality duty, its specific duty under the Act, and improve its service delivery.

3. What we do – Customer Facing Actions (CFA)

Ref	Action	General Equality	Owner	Review
CFA01	Engage opportunities to encourage diversity of our Board membership and create dialogue with under-represented groups (specifically disabled people).	<ul style="list-style-type: none"> • Advance Equality of Opportunity 	Chair of the Board	Ongoing through specific engagement opportunities
CFA02	Ensure that all our staff follow SSSC’s Code of Conduct. The Code is part of our Induction Pack for all staff. Refresher and updates are delivered as required.	<ul style="list-style-type: none"> • Eliminate Discrimination • Advance Equality of Opportunity • Foster Good Relations 	Director of Self-Directed Support	Completed and ongoing, August 2024 refresher with staff is planned due to SSSC updates.
CFA03	Continue to amend our website to create clear visual communication, making appropriate use of audio/video and social media platforms, to increase accessibility and reduce barriers for disabled people. Follow good practice guidance on design for our website and all publications and provide documents in alternative languages and formats	<ul style="list-style-type: none"> • Eliminate Discrimination • Foster Good Relations 	Director of Policy	New improved website with greater emphasis on accessibility, live June 22. Achieved new UK Government Standards on Accessibility. Diversified and extended use of social media platforms. Improvements made to Fund literature in the Transition Fund

CFA Ref	Action	General Equality Duty	Owner	Review Update
CFA05	Improvements to application forms and guidance, all designed to be clear and accessible. Including access to Gaelic Language forms.	<ul style="list-style-type: none"> • Advance Equality of Opportunity • Foster Good Relations 	Director of Policy	In progress and ongoing – Gaelic Language forms not yet developed.
CFA06	All roadshows and events undertaken in accessible venues, with as wide a geographic spread as possible, bi-lingual advertising in Gaelic-speaking communities.	<ul style="list-style-type: none"> • Advance Equality of Opportunity • Foster Good Relations 	Director of Policy	Ensured all engagement events for the Independent Living Fund re-opening were held in accessible venues and that all related communication was produced in Plain Language and Easy Read. No events were held in Gaelic Language speaking localities.
CFA07	'Equality check' carried out on Board papers and all publications/key documents to ensure written communication is gender neutral.	<ul style="list-style-type: none"> • Eliminate Discrimination 	All Heads of Department	Ongoing

CFA08	Equality clauses added to all contracts as part of tendering/procurement process and submissions measured against equality criteria.	<ul style="list-style-type: none"> • Advance Equality of Opportunity • Eliminate Discrimination 	Head of Finance	Ongoing
CFA09	Denholm House is an accessible building with an induction loop. ILF Scotland promotes such provision through its servicelevel agreement with the Scottish Government.	<ul style="list-style-type: none"> • Foster Good Relations 	Chief Operating Officer	
CFA10	<p>Through our Corporate Parenting Plan, we will further develop our communications strategy to target care experienced young people and those that support them to ensure they are aware of ILF Scotland Transition and Re-opened Funds.</p> <p>We will ensure ILF Scotland staff and Board Members are aware of the principles of Corporate Parenting through training courses and induction programmes.</p>	<ul style="list-style-type: none"> • Advance Equality of Opportunity 	Director of Policy	<p>Communications Strategy updated.</p> <p>Training delivery September / October 2024</p>

CFA11	Facilitate meetings of the Co-production Working Group every two months in 2024 to 2025, with the first meeting to be scheduled for June 2024.	<ul style="list-style-type: none"> • Advance Equality of Opportunity • Foster Good Relations 	CEO	Ongoing
	Report on learning from the first two months of receiving applications to the re-opened fund and work together with the group and others as required to further develop policies around the key issues raised by disabled people and others at the re-opening engagement events.		Director of Policy	Ongoing
	Arrange further co-production opportunities with our recipients and others as part of our strategic planning consultations in the latter part of 2024 to 2025.		SMT	November 2024

WHAT WE DO TO PROMOTE EQUALITY – ACTIONS WITH STAFF(SA)

SA Ref	Action	General Equality Duty	Owner	Review
SA01	Offer employment opportunities for volunteer/student placements for young people with a disability that places them at a significant disadvantage in the job market.	<ul style="list-style-type: none"> • Advance equality of opportunity 	CEO	Student placements opportunities offered annually.
SA02	Continue induction training for Board Directors and staff on Diversity and Equality.	<ul style="list-style-type: none"> • Eliminate discrimination 	Head of Business Services	Ongoing - DET Training for all staff and Board Directors during induction.
SA03	Gaelic Language Plan, with responsibility held at Senior Management level, helping to raise awareness and culture of relevance to ILF Scotland's staff and recipients.	<ul style="list-style-type: none"> • Advance equality of opportunity • Foster good relations 	Director of Policy	Awareness training delivered across the organisation – Feb 2022. On hold since then due to other completing priorities and no requirement currently for legislative compliance. Will pick up in next strategic plan.

SA Ref	Action	General Equality Duty	Owner	Review
SA04	Information on Equality & Diversity is included in the Staff Handbook/ HR Policies and forms part of the Induction for new staff.	<ul style="list-style-type: none"> • Advance equality of opportunity • Eliminate discrimination • Foster good relations 	Head of Business Services	Complete and on-going for new staff. Refresher sessions for current staff.
SA05	ILF Scotland continues to promote best practice in making sure the office space is suitable for people with differing needs, for instance with an induction loop and disabled access to the building.	<ul style="list-style-type: none"> • Foster good relations • Eliminate discrimination 	Head of Business Services	MOTO and Shared Service Agreement with the Scottish Government.
SA06	Adhere to ILF Scotland HR policies on equality and diversity in the workplace, including work-life balance, development, promotion, work opportunities and recruitment.	<ul style="list-style-type: none"> • Advance equality of opportunity 	Head of Business Services	Completed for all staff and on-going refreshers.
SA07	Regular Conversations take place between staff and line managers and include specific reference to wellbeing to allow any concerns to be acted on.	<ul style="list-style-type: none"> • Foster good relations • Eliminate discrimination 	Head of Business Services	Ongoing regularly through 1-2-1's and training.
SA08	Continue to increase awareness of mental health issues as an equality issue.	<ul style="list-style-type: none"> • Advance equality of opportunity • Eliminate discrimination • Foster good relations 	Head of Business Services	4 x Mental Health First Aiders. Mental Health & Personal Resilience training offered regularly to all staff and Board Directors.

SA Ref	Action	General Equality Duty		Update
SA09	ILF Scotland adheres to the SG (Scottish Government) Fairness at Work policy, which covers equality and diversity.	<ul style="list-style-type: none"> • Foster good relations • Eliminate discrimination 	Head of Business Services	Work with recognised union - PCS to ensure ILF Scotland works to the Fairness at Work principles.
SA10	Raise awareness of neurodiversity and provide staff training to cover this area specifically as part of our equality and diversity training. Provide more detailed training to front line staff working in both Funds so that they can provide better informed customer service to those applications and recipients who are neurodivergent.	<ul style="list-style-type: none"> • Advance equality of opportunity 	Head of Business Services	Raise awareness workshops between 2024-26

4. ILF Scotland HR Policies on Equality & Diversity

ILF Scotland has designed its induction procedures to ensure diversity issues are included and staff are aware of a range of advice, guidance and support provided by ILF Scotland HR team.

4.1 Equal Opportunities Policy Statement

ILF Scotland will treat all staff equally irrespective of their sex, marital/civil partnership status, maternity status, age, race, ethnic origin, sexual orientation, disability, religion, or belief, working pattern, employment status, gender identity, caring responsibility, or trade union membership.

4.2 Diversity Policy Statement

ILF Scotland is committed to increasing the diversity of staff within the organisation. We will develop all our staff, ignoring all irrelevant differences, in their management and development. Furthermore, we will positively value the different perspectives and skills of all staff and make full use of these in our work.

4.3 Resources Available on Diversity & Equality

- Diversity Training.
- Flexi policy and working patterns (flexible working).
- Equality staff networks.
- Inclusive communication.
- How staff can access the Employee Assistance Programme to support wellbeing.

5. Forward Planning

Active consideration of equality will help ILF Scotland to identify ways in which to improve evidence gathering and engagement, to help improve the quality of services it provides, making them more responsive to customer and staff needs, leading to better outcomes.

Senior Managers and Board Directors have a vital role to play in giving a clear and consistent message about the importance of promoting equality and diversity. Through visible leadership, the senior management team will ensure that it reflects equality in performance reporting and that staff are clear ILF Scotland adopts a zero-tolerance approach to discriminatory behaviour and builds the capacity of all staff to consider and promote the equality duties.

5.1 Annex A

Protected Characteristics

- **Protected Characteristics**
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion and belief
 - Sex
 - Sexual orientation

6. EQUALITY & DIVERSITY PLAN – ACTION PLAN (AP)

AP Ref	Action	General Equality Duty	Owner	Update	Review
AP01	Staff satisfaction survey – use to provide data on bullying and harassment, wellbeing, and opportunities. Compare data in-year. Consider adding question to survey to seek staff ideas on improving diversity.	<ul style="list-style-type: none"> • Advance equality of opportunity • Eliminate discrimination • Foster good relations 	Head of Business Services	Ongoing TRICKLE ‘mood senses’ monthly. Working group formed annually to consider survey and improve offering	2024-24 Staff Survey completed and ongoing mood-senses
AP Ref	Action	General Equality Duty	Owner	Update	Review
AP02	The TF online application process reduces access barriers to recipients as they do not need to phone or write to us to access information and do not need to complete a written application form.	<ul style="list-style-type: none"> • Foster good relations 	Director of Policy	Online application process improvements implemented 20/21.	Keep opportunities for further improvements under review. Ongoing
AP03	Equality & Diversity given high profile in induction training for Board Directors.	<ul style="list-style-type: none"> • Advance equality of opportunity • Foster good relations 	Head of Business Services	New Board Directors 2023 onwards	New Board Directors attended Disability Equality Training. Board Directors attend Neurodiversity workshop sessions 2024-26 .

AP Ref	Action	General Equality Duty	Owner	Update	Review
AP04	Increase awareness of cultural importance of Gaelic and promote learning by providing training and BnG presentation to Board.	<ul style="list-style-type: none"> Foster good relations 	Director of Policy / Head of Business Services	Progress started on a voluntary basis at present well in advance of requirement to produce Plan in full.	On hold
AP05	Ensure all venues for roadshows are accessible and bi-lingual advertising in Gaelic-speaking areas.	<ul style="list-style-type: none"> Eliminate discrimination Foster good relations 	Director of Policy	No public events held in Gaelic-speaking areas.	
AP06	Actions to promote increased awareness of Mental Health in the Workplace	<ul style="list-style-type: none"> Advance equality of opportunity Eliminate discrimination Foster good relations 	Head of Business Services	<p>Training 'Supporting each other in a Crisis' -April 2020.</p> <p>Personal Resilience - March 2021.</p> <p>Returning to Workplace – - May 2022.</p> <p>4 x Mental Health First Aiders trained and in post.</p>	Continue Mental Health & Resilience workshops and raising awareness annually.