

ILF Scotland

**EQUALITY DUTY
ACTION PLAN**

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2. Introduction

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 [Equality and Human Rights Commission \(EHRC\)](#) regulate 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)

2.1 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.

2.2 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?

2.3 Board Members

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

2.4 Senior Managers

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

2.5 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.

2.6 Communications Staff

Help ensure relevant equality information is available and accessible.

2.7 Frontline Staff

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

2.8 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 them.

2.9 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.

3. Key ILF Scotland Documents

The primary function of ILF Scotland is to operate a discretionary fund providing financial awards to over 4000 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:

- ILF Scotland Policies
- 2020-2023 Strategic Plan
- 2020-2023 Business Plan

3.1 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 equality.

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 continue to revisit this assessment throughout the lifecycle of the policy in place.

3.2 2020-23 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 is able to support individuals.

3.3 2020-23 Business Plan

ILF Scotland will improve its evidence base by gathering information from recipients, applicants and staff through various the use of equality monitoring forms, where applicable, and 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.

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

Reference: CFA01

Action: Engage opportunities to encourage diversity of Board and create dialogue with under-represented groups (specifically disabled people).

General Equality Duty: Advance Equality of Opportunity

Owner: Chair of the Board

Review:

Reference: CFA02

Action: Follow Code of Conduct – SSSC for all staff, communicated to all staff and included in Induction Pack.

General Equality Duty: Eliminate Discrimination, Advance Equality of Opportunity, Foster Good Relations

Owner: Director of Self-Directed Support

Review: Completed and ongoing, June 2022 refresher with staff.

Reference: CFA03

Action: Continue to amend website to create clear visual communication, use of audio/video and social media platforms, to increase accessibility and reduce barriers to young people and disabled people. Best practice guidance on design also utilised for other publications, with the provision of alternative formats on request.

General Equality Duty: Eliminate Discrimination, Foster Good Relations

Owner: Director of Policy

Review: New improved website with greater emphasis on accessibility, live June 22. Diversified and extended use of social media platforms. Improvements made to Fund literature & TF application

Reference: CFA04

Action: EQIA exercise to be carried out and EQIA published for all new and revised external policies (which are determined by Scottish Government Ministers). To comply with Equality Legislation and good practice. Director of Policy. Completed and ongoing.

EQIAs to be completed for other key business decisions.

General Equality Duty: Eliminate Discrimination, Foster Good Relations

Owner: Director of Policy, All Heads of Departments

Review: Completed and ongoing. EQIA Training for Management Team – May 2022

Reference: CFA05

Action: Improvements to application forms and guidance, all designed to be clear and accessible. Including access to Gaelic Language forms.

General Equality Duty: Advance Equality of Opportunity, Foster Good Relations

Owner: Director of Policy

Review: In progress and ongoing.

Reference: CFA06

Action: All roadshows and events undertaken in accessible venues, with as wide a geographic spread as possible, bi-lingual advertising in Gaelic-speaking communities.

General Equality Duty: Advance Equality of Opportunity, Foster Good Relations.

Owner: Director of Policy

Review: Will take on board with in-person events starting up again in 2022-23.

Reference: CFA07

Action: 'Equality check' carried out on Board papers and all publications/key documents to ensure written communication is gender neutral.

General Equality Duty: Eliminate Discrimination

Owner: All Heads of Department

Review: Ongoing

Reference: CFA08

Action: Equality clauses added to all contracts as part of tendering/procurement process and submissions measured against equality criteria.

General Equality Duty: Advance Equality of Opportunity, Eliminate Discrimination

Owner: Head of Finance

Review:

Reference: CFA09

Action: Denholm House is an accessible building with an induction loop. ILF Scotland promotes such provision through its service level agreement with SG.

General Equality Duty: Foster Good Relations

Owner: Chief Operating Officer

Review:

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

SA Ref: SA01

Action: Offer employment opportunities for volunteer/student placements for young people with a disability that places them at a significant disadvantage in the job market.

General Equality Duty: Advance equality of opportunity

Owner: CEO

Review: 1 intern employed during 2020 with ongoing commitment to support student placements on a regular basis.

SA Ref: SA02

Action: Continue induction training for Board Directors and staff on Diversity and Equality.

General Equality Duty: Eliminate discrimination

Owner: Head of Business Services

Review: DET Training for all staff and Board Directors

SA Ref: SA03

Action: Gaelic Language Plan, with responsibility held at Senior Management level, helping to raise awareness and culture of particular relevance to ILF Scotland's staff and recipients.

General Equality Duty: Advance equality of opportunity, Foster good relations.

Owner: Director of Policy

Review: Awareness training delivered across the organisation – Feb 2022. Continue work to develop GL Plan. 2022-23 involving Board member.

SA Ref: SA04

Action: Information on Equality & Diversity is included in the Staff Handbook/ HR Policies and forms part of the Induction for new staff.

General Equality Duty: Advance equality of opportunity, Eliminate discrimination, Foster good relations.

Owner: Head of Business Services

Review: Complete and on-going for new staff. Refresher sessions for current staff.

SA Ref: SA05

Action: 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.

General Equality Duty: Foster good relations, Eliminate discrimination

Owner: Head of Business Services

Review: MOTO and Shared Service Agreement with SG.

SA Ref: SA06

Action: Adhere to ILF Scotland HR policies on equality and diversity in the workplace, including work-life balance, development, promotion, work opportunities and recruitment.

General Equality Duty: Advance equality of opportunity

Owner: Head of Business Services

Review: Completed for all staff and on-going refreshers.

SA Ref: SA07

Action: Regular Conversations take place between staff and line managers and include specific reference to well-being to allow any concerns to be acted on.

General Equality Duty: Foster good relations, Eliminate discrimination

Owner: Head of Business Services

Review: Availability of Health & Well-being – supported by Staff Well-being Champion.

SA Ref: SA08

Action: Continue to increase awareness of mental health issues as an equality issue.

General Equality Duty: Advance equality of opportunity, Eliminate discrimination, Foster good relations

Owner: Head of Business Services

Review: 4 x Mental Health First Aiders. Mental Health & Personal Resilience training offered regularly to all staff and Board Directors.

SA Ref: SA09

Action: ILF Scotland adheres to the SG Fairness at Work policy, which covers equality and diversity.

General Equality Duty: Advance equality of opportunity, Eliminate discrimination, Foster good relations

Owner: Head of Business Services

Review: Work with recognised union - PCS to ensure ILF Scotland works to the Fairness at Work principles.

5. 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.

5.1 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.

5.2 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.

5.3 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.

6. 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. In 2021-22, the executive team will work with Board Directors to take the organisation to 2022-23 via a series of reviews of activity on equality and diversity. In addition to the work currently undertaken, ILF Scotland will use the following:

- **Staff Satisfaction Surveys** – building on the annual survey and data gathering, to provide improved data on attitudes and issues around equality and diversity; noting that because of the size of the organisation, anonymising information from staff surveys is challenging.
- **Customer Feedback** – we will develop a feedback strategy, which will incorporate the range of customer feedback methods ILF Scotland will use and consider any barriers for people with ‘protected characteristics’ and how the organisation might mitigate these.
- **Transition Fund Online** – improve accessibility of online application form, information and website content to reduce barriers for people with ‘protected characteristics’ who are applying to the fund.
- **Induction Training Programme** – ensure equality and diversity is given an appropriate profile in the early training delivered to new Board members.

6.1 Annex A

Protected Characteristics

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

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

AP Ref: AP01

Action: 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.

General Equality Duty: Advance equality of opportunity, Eliminate discrimination, Foster good relations

Owner: Head of Business Services

Update: Ongoing TRICKLE ‘moodsenses’ monthly. Working group formed annually to consider survey and improve offering

Review: 2021-22 Staff Survey deadline. 31st^h May 2022.

AP Ref: AP02

Action: 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.

General Equality Duty: Foster good relations

Owner: Director of Policy

Update: Online application process improvements implemented 20/21.

Review: Keep opportunities for further improvements under review. Ongoing.

AP Ref: AP03

Action: Equality & Diversity given high profile in induction training for Board Directors.

General Equality Duty: Advance equality of opportunity, Foster good relations

Owner: Head of Business Services

Update: No new Board Directors appointed 2021-22

Review:

AP Ref: AP04

Action: Increase awareness of cultural importance of Gaelic and promote learning by providing training and BnG presentation to Board.

General Equality Duty: Foster good relations

Owner: Director of Policy / Head of Business Services

Update: Progressing this on a voluntary basis at present well in advance of requirement to produce Plan.

Review: Ongoing

AP Ref: AP05

Action: Ensure all venues for roadshows are accessible and bi-lingual advertising in Gaelic-speaking areas.

General Equality Duty: Eliminate discrimination, Foster good relations

Owner: Director of Policy

Update: No public events due to COVID-19. These will restart 2022-23

Review:

AP Ref: AP06

Action: Actions to promote increased awareness of Mental Health in the Workplace.

General Equality Duty: Advance equality of opportunity, Eliminate discrimination, Foster good relations.

Owner: Head of Business Services

Update: Training 'Supporting each other in a crisis' -April 2020. Personal Resilience - March 2021. Returning to Workplace – May 2022. 4 x Mental Health First Aiders trained and in post.

Review: Continue Mental Health & Resilience workshops and raising awareness through 2022-23

AP Ref: AP07

Action: Continue to consider Equality Duty in all external and internal facing policy changes. Executive Team should continue to consider and approve all changes.

General Equality Duty: Advance equality of opportunity, Eliminate discrimination, Foster good relations

Owner: Director of Policy / All Heads of Departments for key business decisions

Update: In progress for recent review of all ILFS policies.

Review: Complete 2021-22. Continuous work.

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