



# **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.

Under the Equality Act 2010, as a Scottish public authority, ILF Scotland is required to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Though listed in Schedule 19 of the Act covering the general equality duties, ILF Scotland is not subject to reporting obligations under the additional ‘specific duties’ regulations.

### **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 from equality groups.

**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.

**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. It also its functions and relationships to contribute to the Scottish Government's aims for a more equal society.

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 the proposed 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 on and as an embedded part of the policy development process so that the assessment can shape, inform and influence the policy proposals.

### 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 surveys to strengthen its understanding 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.

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

Ref	Action	General Equality Duty	Owner	Review
CFA01	Engage opportunities to encourage diversity of Board and create dialogue with under-represented groups (specifically disabled people).	<ul style="list-style-type: none"> <li>• Advance Equality of Opportunity</li> </ul>	CEO	
CFA02	Follow Code of Conduct – SSSC for all staff, Communicated to all staff and included in Induction Pack.	<ul style="list-style-type: none"> <li>• Eliminate Discrimination</li> <li>• Advance Equality of Opportunity</li> <li>• Foster Good Relations</li> </ul>	Director of Self Directed Support	
CFA03	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 people with disabilities. Best practice guidance on design also utilised for other publications, with the provision of alternative formats on request.	<ul style="list-style-type: none"> <li>• Eliminate Discrimination</li> <li>• Foster Good Relations</li> </ul>	Director of Policy	Increased use of social media platforms.
CFA04	EQIA to be carried out and published for all new and revised external policies. To comply with Equality Legislation and good practice. Director of Policy. Completed and ongoing.	<ul style="list-style-type: none"> <li>• Eliminate Discrimination</li> <li>• Foster Good Relations</li> </ul>	Director of Policy	Completed and ongoing

CFA Ref	Action	General Equality Duty	Owner	Review
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"> <li>• Advance Equality of Opportunity</li> <li>• Foster Good Relations</li> </ul>	Director of Policy	
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"> <li>• Advance Equality of Opportunity</li> <li>• Foster Good Relations</li> </ul>	Director of Policy	
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"> <li>• Eliminate Discrimination</li> </ul>	All Heads of Department	
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"> <li>• Advance Equality of Opportunity</li> <li>• Eliminate Discrimination</li> </ul>	Head of Finance	
CFA09	Denholm House is an accessible building with an induction loop. ILF Scotland promotes such provision through its service level agreement with SG.	<ul style="list-style-type: none"> <li>• Foster Good Relations</li> </ul>	Chief Operating Officer	

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

SA Ref	Action	General Equality Duty	Owner	Review
<b>SA01</b>	Continue engagement with Inclusion Scotland Internship programme, offering employment opportunity places young people with a disability that places them at a significant disadvantage in the job market.	<ul style="list-style-type: none"> <li>Advance equality of opportunity</li> </ul>	CEO	1 intern employed during 2020
<b>SA02</b>	Continue induction training for Board Directors and staff on Diversity and Equality.	<ul style="list-style-type: none"> <li>Eliminate discrimination</li> </ul>	Head of Business Services	DET Training completed for all staff and Board Directors during induction.
<b>SA03</b>	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.	<ul style="list-style-type: none"> <li>Advance equality of opportunity</li> <li>Foster good relations</li> </ul>	Director of Policy	Create Action Plan tend Q3 2020. Deliver Awareness training across the organisation delivered

SA Ref	Action	General Equality Duty	Owner	Review
<b>SA04</b>	Information on Equality & Diversity is included in the Staff Handbook and forms part of the Induction for new staff.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Business Services	Complete
<b>SA05</b>	Specific training sessions have been delivered to cover Autism in the workplace	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>	Head of Business Services	Diversity Awareness training day for all staff organised in 2019.
<b>SA06</b>	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"> <li>• Advance equality of opportunity</li> </ul>	Head of Business Services	
<b>SA07</b>	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"> <li>• Foster good relations</li> <li>• Eliminate discrimination</li> </ul>	Head of Business Services	Availability of Health & Wellbeing – supported by Staff Wellbeing Champion
<b>SA08</b>	Continue to increase awareness of mental health issues as Equality issue.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Business Services	Mental Health First Aider training to 4 staff completed Spring 2020. Mental Health & Personal Resilience training offered annually.

SA Ref	Action	General Equality Duty		Update
<b>SA09</b>	ILF Scotland adheres to the SG Fairness at Work policy, which covers equality and diversity.	<ul style="list-style-type: none"> <li>• Foster good relations</li> <li>• Eliminate discrimination</li> </ul>	Head of Business Services	Sign off ILF Scotland Fairness at Work Agreement with recognised Union PCS – 2020-21.
<b>SA10</b>	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"> <li>• Foster good relations</li> <li>• Eliminate discrimination</li> </ul>	Head of Business Services	MOTU and Shared Service Agreement with SG

## **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 2020-21, the executive team will work with Board Directors to take the organisation to 2021-22 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 Journey-Mapping** – design a mapping exercise to test whether the Recipient Feedback forms create barriers for some people with ‘protected characteristics’ and consider how the organisation might mitigate these.
- **Transition Fund Online** – using predicted improved engagement with recipients to measure whether putting the Transition Fund online reduces access barriers and reviewing the impact this has, to see whether it could lead on to further innovations.
- **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**

- **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	Action	General Equality Duty	Owner	Update	
AP01	<p>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.</p>	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Business Services	<p>Staff Survey deadline 30<sup>th</sup> June, next survey scheduled for June 2021.</p>	

AP Ref	Action	General Equality Duty	Owner	Update	Review
<b>AP02</b>	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"> <li>• Foster good relations</li> </ul>	Director of Policy		
<b>AP03</b>	Equality & Diversity given high profile in induction training for Board Directors.	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Foster good relations</li> </ul>	Head of Business Services		

AP Ref	Action	General Equality Duty	Owner	Update	Review
<b>AP04</b>	Increase awareness of cultural importance of Gaelic and promote learning by providing training and BnG presentation to Board.	<ul style="list-style-type: none"> <li>• Foster good relations</li> </ul>	Director of Policy / Head of Business Services		
<b>AP05</b>	Ensure all venues for Roadshows are accessible and bi-lingual advertising in Gaelic-speaking areas.	<ul style="list-style-type: none"> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Director of Policy		
<b>AP06</b>	Actions to promote increased awareness of Mental Health in the Workplace	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Head of Business Services	Training delivered November 2019. 'Supporting each other in a crisis' – delivered April 2020. 4 x mental Health First Aiders trained and in post.	

<b>AP07</b>	<p>Continue to consider Equality Duty in all external and internal facing policy changes. Executive Team should continue to consider and approve all changes.</p>	<ul style="list-style-type: none"> <li>• Advance equality of opportunity</li> <li>• Eliminate discrimination</li> <li>• Foster good relations</li> </ul>	Executive Team		
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