

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 1 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 Equality Duty Action Plan sets out how ILF Scotland will meet its statutory equality duties, promote equality of opportunity, eliminate discrimination and foster good relations. It also provides a framework for monitoring progress and ensuring equality considerations are embedded in service delivery and employment practices.

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

1.3 Who Should be Aware of the General Duty in ILF Scotland?

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.

Senior Managers

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

Equality and Diversity Staff

Lead, promote and support equality, diversity and inclusion across the organisation, building awareness, capability and compliance with the Public Sector Equality Duty.

Communications Staff

Help ensure relevant equality information is available and accessible.

Frontline Staff

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

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.

Line Managers

Line managers are responsible for applying equality, diversity and inclusion principles in day-to-day management practice and ensuring fair, consistent and inclusive treatment of all employees.

2. Key ILF Scotland Documents

The primary function of ILF Scotland is to operate discretionary funds 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 [Award Policies](#) / [Transition Fund Policies](#) and associated [EQIAs](#)
- [ILF Scotland Strategy 2025 to 2028](#)

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 / practice 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 ILF Scotland Strategy 2025 to 2028

The vision set out in the [ILF Scotland Strategic Plan 2025 to 2028](#) 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 ILF Scotland Business Plan 2026 to 2028

As stated in the [Business Plan 2026 to 2028](#), 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 to Promote Equality

Customer Facing Actions (CFA)

CFA Reference: CFA01

Action:

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

General Equality Duty:

- Advance Equality of Opportunity

Owner:

Chair of the Board

Review:

Ongoing through specific engagement opportunities and in partnership with the Public Appointments Team during periods of Board recruitment.

CFA Reference: CFA02

Action:

Ensure that all our staff follow SSSC and NISCC Codes of Practice. The Code is part of our Induction Pack for all staff. Refresher and updates are delivered as required.

General Equality Duty:

- Eliminate Discrimination
- Advance Equality of Opportunity
- Foster Good Relations

Owner:

Director of Independent Living

Review:

Completed and ongoing.

[Scottish Social Services Council Codes of Practice](#) [NISCC Standards for Conduct and Practice for Social Care Practitioners](#)

CFA Reference: CFA03

Action:

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 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 2022.

Achieved new UK Government Standards on Accessibility.

Diversified and extended use of social media platforms.

Improvements made to Fund literature in the Transition Fund application process.

Accessibility internal working group established to review key material.

Focus on making all key public documents accessible.

CFA Reference: CFA04

Action:

EQIA published for all new and revised external policies, the framework of this is determined by Scottish Government Ministers.

EQIAs to be completed for internal policies.

EQIAs to be completed for other key business decisions.

Repeat training exercise for Managers on completing EQIAs.

General Equality Duty:

Owner:

Director of Policy

Director of HR & Business Services

All Heads of Departments

HR & Policy

Review:

Completed

Completed

Ongoing

Completed - EQIA Training for Management Team – May 2025. Refresher training will take place during Q3 2026 to 2027.

CFA 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 – Gaelic Language forms not yet developed. No legislative requirement as yet.

CFA 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:

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.

CFA 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

CFA 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:

Ongoing

CFA Reference: CFA09

Action:

Denholm House is an accessible building with an induction loop. ILF Scotland promotes such provision through its service level agreement with the Scottish Government.

General Equality Duty:

- Foster Good Relations

Owner:

Chief Operating Officer

CFA Reference: CFA10

Action:

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.

We will ensure ILF Scotland staff and Board Members are aware of the principles of Corporate Parenting through training courses and induction programmes.

General Equality Duty:

- Advance Equality of Opportunity

Owner:

Director of Policy

Review:

Communications Strategy updated.

Completed - Training delivery September / October 2024

CFA Reference: CFA11

Action:

Facilitate meetings of the Co-Production Working Group regularly.

Report regularly on learning from 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.

Arrange further co-production opportunities with our Recipients and others as part of our strategic planning consultations.

General Equality Duty:

- Advance Equality of Opportunity
- Foster Good Relations

Owner:

CEO

Director of Policy

SLT

Review:

Ongoing – from 2026 to 2027 the group meets on an as required basis.

Complete for policy realignment, carers component. Ongoing, DPO pilot and Threshold Sum.

Series of engagement events delivered for 2025 to 2028 strategy and Advisory Groups input to Business Plan

Staff Actions (SA)

SA Reference: 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.

Offer social work student placements to promote the Social Model of Disability within statutory social work.

General Equality Duty:

- Advance equality of opportunity

Owner:

CEO

Director of Independent Living

Review:

Ongoing

SA Reference: SA02**Action:**

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

General Equality Duty:

- Eliminate discrimination

Owner:

Director of Business Services

Review:

Ongoing - DET Training for all staff and Board Directors during induction.

SA Reference: SA03**Action:**

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.

General Equality Duty:

- Advance equality of opportunity
- Foster good relations

Owner:

Director of Policy

Review:

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 Reference: SA04

Action:

Information on Equality and 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:

Director of Business Services

Review:

Complete and ongoing for new staff. Refresher sessions for current staff.

New [Equality and Diversity Policy](#) published June 2025.

SA Reference: 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:

Finance and Business Services

Review:

MOTO and Shared Service Agreement with the Scottish Government.

SA Reference: 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:

Director of Business Services

Review:

Completed for all staff and ongoing refreshers.

SA Reference: SA07

Action:

Regular conversations between staff and managers include wellbeing, development and inclusion, ensuring concerns are identified and addressed at an early stage.

General Equality Duty:

- Foster good relations
- Eliminate discrimination

Owner:

Director of Business Services

Review:

Ongoing regularly through 1-2-1s and training.

SA Reference: 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:

Director of Business Services

Review:

6 x Mental Health First Aiders.

Mental Health and Personal Resilience training offered regularly to all staff and Board Directors.

SA Reference: SA09

Action:

Continue to increase equality for disabled people living in poverty

General Equality Duty:

- Socio-economic duty

Owner:

Director of Independent Living

Director of Policy

Review:

Ongoing: Provide regular welfare rights and income maximisation training to all operational staff.

Provide an inhouse welfare rights service for staff to respond to ILF Recipients.

For 2027: Target areas of highest SIMDs for the Transition Fund.

Poverty included in EQIAs.

SA Reference: SA10

Action:

ILF Scotland adheres to the SG (Scottish Government) Fairness at Work policy, which covers equality and diversity.

General Equality Duty:

- Foster good relations

- Eliminate discrimination

Owner:

Director of Business Services

Review:

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

SA Reference: SA11

Action:

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.

General Equality Duty:

- Advance equality of opportunity

Owner:

Director of Business Services

Review:

Awareness workshops delivered Q3 2025 to 2026 with further workshops planned for Q3 2026 to 2027. Established the NeuroMinds Working Group to promote understanding of neurodiversity, gather staff insights, and support the development of a more inclusive workplace for neurodivergent colleagues.

4. ILF Scotland HR Policies on Equality, Diversity & Inclusion

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 policies and 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 advancing equality, fostering good relations and creating an inclusive workplace where diversity is valued and everyone can thrive.

We will ensure that all employees and job applicants are treated fairly and with respect, regardless of their background, identity or circumstances. We are committed to providing equitable access to employment, learning, development and progression opportunities.

We recognise that a diverse workforce brings a wider range of skills, experiences and perspectives that strengthen our organisation and enhance the support we provide. We will actively promote an inclusive culture where differences are recognised as a source of strength, and where every individual feels valued, listened to and empowered to contribute.

We will monitor our progress, challenge discrimination and remove barriers wherever possible, supporting our commitment to equality, diversity and inclusion across all areas of 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 in demonstrating visible leadership and accountability for equality, diversity and inclusion. Through ongoing engagement, training and performance monitoring, ILF Scotland will continue to embed equality considerations across all areas of its work.

5.1 Annex A: Protected Characteristics

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

* The socio-economic duty is contained in Section 1 of the Equality Act 2010 although it has never been enacted. The duty would require public authorities to actively consider the way in which their decisions increase or decrease the inequalities that result from socio-economic disadvantage. ILF Scotland is committed to supporting disabled people living in poverty.

6. Equality, Diversity & Inclusion Plan – Action Plan (AP)

AP Reference: AP01

Action:

Staff satisfaction survey – use to provide data on bullying and harassment, wellbeing, and opportunities. Compare data in-year. Use staff feedback to identify opportunities to improve equality, diversity, inclusion and employee wellbeing, and monitor progress over time.

General Equality Duty:

- Advance equality of opportunity
- Eliminate discrimination
- Foster good relations

Owner:

Director of Business Services

Update:

Working group formed annually to consider survey and improve offering

Review:

2025 to 2026 Staff Survey completed.

AP Reference: 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 2020 to 2021.

Review:

Keep opportunities for further improvements under review.
All TF policies reviews for accessibility and fit for purpose.
TF Evaluation may highlight opportunities for further improvement.
Ongoing

AP Reference: AP03**Action:**

Equality, Diversity & Inclusion given high profile in induction training for Board Directors

General Equality Duty:

- Advance equality of opportunity
- Foster good relations

Owner:

Director of Business Services

Update:

New Board Directors 2023 onwards

Review:

New Board Directors attend Disability Equality Training. Board Directors attend Neurodiversity workshop sessions 2024 to 2026.

AP Reference: 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 / Director of Business Services

Update:

Progress started on a voluntary basis at present well in advance of requirement to produce Plan in full.

Review:

On hold – not yet a legislative requirement for ILF Scotland.

AP Reference: 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 held in Gaelic-speaking areas.

Review:

Can be accommodated if required.

AP Reference: 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:

Director of Business Services

Update:

6 x Mental Health First Aiders trained and in post.

Review:

Continue Mental Health & Resilience workshops and raising awareness annually. (ongoing – next Q3 2026 to 2027).