

## Equality Impact Assessment Template – Policy, function or strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended.

<b>1. Policy, function or strategy</b>		
a.	Name/description of the policy, function or strategy <sup>1</sup>	Implementation of the Equally Safe at Work (ESaW) accreditation programme and associated Violence Against Women Policy and Sexual Harassment Policy, and Equality and Diversity Policy
b.	Responsible organisation(s)/Lead Service	Organisational Development (OD), Policy and Communications Service
c.	Lead Officer	Sharon Sale, Violence Against Women Co-ordinator/Alex Hughes, OD Team Leader
d.	Date of Impact Assessment	18/12/2023
e.	Partners/other Services involved in the development of the policy, function or strategy	Close the Gap - Scotland's expert policy advocacy organisation working on women's labour market participation. They work with policymakers, employers and employees to address the causes of women's inequality at work. The ESaW programme recognises that employers have a key role to play in tackling this inequality as it is a necessary step in preventing violence against women, which is an employment issue in itself whether it occurs inside or outside the workplace.
f.	Is the policy, function or strategy?	X    New
		X    Reviewed/Revised
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy,	Inverclyde Council made a pledge to commit to workplace equality aimed at promoting greater diversity within the workforce and tackling violence against women. Over 18

<sup>1</sup> Please attach details of the policy, function or strategy to this Template

	function or strategy or the substantive change to the policy, function or strategy)?	<p>months, the Council took part in a range of activities and developed policies and practices towards becoming an ESaW-accredited employer.</p> <p>On 04/12/23, Inverclyde Council was presented with the accreditation in achieving Bronze Level of the Award.</p> <p>A new policy on Violence Against Women Policy was created. The Sexual Harassment Policy was originally in the Council's Dignity and Respect Policy but this was extracted to be a standalone Policy. The Employee Code of Conduct and the Equality and Diversity Policies were updated to include sections on violence against women to comply with the criteria required for the Award.</p>	
h.	What are the intended outcomes of the policy, function or strategy?	The new and amended Policies aim to develop gender-sensitive employment practice/s.	
i.	Geographical area (Inverclyde-wide or a specific location)	Inverclyde-wide	
j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
		X	Advance equality of opportunity between people of different groups
		<input type="checkbox"/>	Foster good relations between people from different groups
k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	Yes, via membership of working groups/forums including, for example, the Council's Workforce Development Group, the Trade Union Liaison Group and the Women's Forum.	

2. Does the policy, function or strategy impact on:	Yes	No
a. Protected Characteristics under The Equality Act 2010: Age; Care experienced; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation ( <b>see Section 3</b> )	Yes	
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty <sup>2</sup> ( <b>see Section 6</b> )	Yes	
c. Inverclyde Alliance Partnership Plan 2023/33 <sup>3</sup> ( <b>see Section 7</b> )	Yes	
d. Council Plan 2023/28 <sup>4</sup> ( <b>see Section 8</b> )	Yes	
<b>3. If 'Yes' is selected for any part of Section 2, please populate the other relevant Sections of this Template.</b>		
<b>4. If 'No' is selected for <u>every part</u> of Section 2, please state the reasons for this.</b>		
<p><b>Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy and Performance Officer:</b></p> <p><b><u><a href="mailto:karen.barclay@inverclyde.gov.uk">karen.barclay@inverclyde.gov.uk</a></u></b></p>		
Signature:	Date:	

<sup>2</sup> [Fairer Scotland Duty: guidance for public bodies](#)

<sup>3</sup> [Inverclyde Alliance Partnership Plan 2023/33](#)

<sup>4</sup> [Council Plan 2023/28](#)

3. Impact – Protected Characteristics						
Which of the Protected Characteristics will the policy, function or strategy have an impact upon?						
Protected Characteristic	Impact					Reasons/Comments
	Positive High	Positive Low	Neutral	Negative High	Negative Low	
Age	X					<p>Intersectionality and the overlapping discrimination can be experienced by some women because of their age, gender and the specific community they belong to. Every woman’s experience will be different.</p> <p>Older women may be either caring for, or being cared for by, their abuser. This abuse may be hidden as signs of physical and psychological abuse may be overlooked on account of a person’s age. Older women also face significant barriers to support or when trying to leave an abusive partner, including isolation, long-term health consequences or disabilities, or they are reliant on their abuser for care or money. Structural gender inequality, including pension policies, reinforces older women’s financial reliance on an abusive partner.</p> <p>All children and young people can also be affected by these compounding inequalities, with girls experiencing particularly high rates of inequality and violence.</p>
Care experienced	X					<p>Multiple and intersecting inequalities are experienced by some women, including those in poverty and care experienced women.</p> <p>All children and young people can also be affected by these compounding inequalities, with girls experiencing particularly high rates of inequality and violence.</p>

Disability	X				<p>Disabled women and girls are particularly vulnerable to exploitation and coercion. Research undertaken by the Scottish Commission for People with Learning Disabilities highlights that people with a learning disability may be 10 to 12 times more likely to experience sexual assault than their non-disabled peers. They can also face significant barriers to accessing support due to services not meeting their needs or making assumptions about their capacity or credibility.</p>
Gender Reassignment	X				<p>Specific risk factors affecting transgender women and girls include high levels of transphobic street harassment and hate crime, and greater levels of social isolation. These lead to high levels of risk and increased difficulties in accessing services. Members of the trans community are often overrepresented in the sex industry, linked to wider discrimination and reduced options.</p>
Marriage and Civil Partnership	X				<p>Gender norms promote ideals of masculinity based on men’s authority, entitlement, and power can lead to abuse, exploitation, and sexual violence. Risks relating to domestic abuse increase during separation and divorce.</p>
Pregnancy and Maternity	X				<p>Women face increased risk of domestic abuse in pregnancy and early maternity and frequency and intensity can increase over the duration of the relationship. This is compounded by their dependency on partners at this time.</p>
Race	X				<p>Black and Minority Ethnic (BME) women and girls may face more barriers to accessing services as a result of language, immigration status, institutional racism, and cultural insensitivity. These are compounded for women experiencing violence against women and girls (VAWG) and experiences may be exacerbated and reinforced by patriarchal ideas and practices by religious and/or community leaders. BME women and girls are also subjected to racist, misogynist verbal harassment in public spaces. Harmful practices such as female genital mutilation and forced marriages can be more prevalent among faith-based or minoritised communities and often include multiple perpetrators. Refugee and asylum-seeking women and girls may have</p>

					<p>experienced various forms of VAWG either in their country of origin, during their journey to Scotland, or upon arrival. Conflict and displacement at key sites where there is VAWG, can create additional risks. They may also be reluctant to disclose or report abuse occurring in the UK for fear of negative experiences with professionals due to institutional racism, unconscious bias, hostile Immigration policies and concerns that court cases and police reports could negatively affect their asylum claim. Complex trauma can manifest in different ways, resulting in women and girls finding it very difficult to disclose. Those who are in the UK on a spousal or family visa and dependent on the status of a partner can be at increased risk. They have had no support from those who should have acted as a support system in the past, so have lost faith in ever finding help and fear speaking out. Others fear society's judgement as sometimes the victim is blamed. They may have restricted or no access to money or their passports. Women with insecure immigration status, (e.g. women who have breached a visa condition or have been trafficked to the UK) can also be at increased risk of exploitation. Fear of being deported can make women reluctant to report violence, abuse, or exploitation. Restricted access or no recourse to public funds constrain their ability to leave an abusive or exploitative partner by restricting their access to support services and many social security entitlements.</p>
Religion and Belief	X				<p>Gypsy/Traveller women can experience barriers to seeking support due to prejudice and ignorance among the wider public towards them, low literacy levels and lack of trust in/fear of getting involved with services. Because of the ways gypsy/travellers live, they are frightened their cultures will be discriminated against, so they would not tend to come forward to disclose abuse experienced.</p>
Sex	X				<p>The Policies will mostly benefit female employees as they will have access to the Policies and the majority of victims of gender-based violence are women. However, men can also be affected and will have access to support.</p>

Classification: Official

Sexual Orientation	X					Lesbian and bisexual women and girls experience violence, abuse, and exploitation which target their sexual orientation. Homophobia and biphobia can encourage VAWG (or be used by perpetrators as components of VAWG). This can also affect gay and bisexual men in the same way.
Other groups to consider			X			
<ul style="list-style-type: none"> <li>• Carers</li> <li>• The Armed Forces Covenant Duty</li> </ul>						

<b>4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?</b>	
X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
X	Advance equality of opportunity between people from different groups
<input type="checkbox"/>	Foster good relations between people from different groups

<b>5. Impact – Groups</b>	
From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.	
<b>Positive impact</b>	<b>Negative impact</b>

<p style="text-align: center;">+</p> <p style="text-align: center;"><i>(Describe groups affected.)</i></p>	<p style="text-align: center;">-</p> <p style="text-align: center;"><i>(Describe groups affected.)</i></p>
<p><u>Age</u>: By raising the profile of gender-based violence and awareness of what constitutes consent, healthy relationships and positive gender roles will affect all people across Scotland. The greatest people affected will be female employees of all ages.</p> <p><u>Care experienced</u>: Multiple and intersecting inequalities are experienced by some women, including those in poverty and care experienced women. These Policies will allow these issues to be highlighted.</p> <p><u>Disability</u>: Disabled people may be subject to additional risks in their lives that could place them at higher risk of experiencing violence or abuse as adults. These Policies will enable these issues to be highlighted.</p> <p><u>Gender Reassignment</u>: Specific risk factors affecting transgender women and girls include high levels of transphobic street harassment and hate crime, and greater levels of social isolation. These lead to high levels of risk and increased difficulties in accessing services. These Policies will allow these issues to be highlighted.</p> <p><u>Marriage and Civil Partnership</u>: Gender norms promote ideals of masculinity based on men’s authority, entitlement, and power can lead to abuse, exploitation, and sexual violence. Risks relating to domestic abuse increase during separation and divorce. These Policies will allow these issues to be highlighted.</p> <p><u>Pregnancy and Maternity</u>: New or expectant mothers may be more vulnerable to the risk of violence and abuse (especially domestic abuse). These Policies will enable these issues to be highlighted.</p> <p><u>Race</u>: People of some ethnicities may be subject to additional risks in their lives that could place them at higher risk of experiencing violence</p>	



<p>or abuse as adults. These Policies will enable these issues to be highlighted.</p> <p><u>Religion and Belief</u>: BME women and girls may face more barriers to accessing services as a result of language, immigration status, institutional racism, and cultural insensitivity. These are compounded for women experiencing VAWG. Refugee and asylum-seeking women and girls may have experienced various forms of VAWG either in their country of origin, during their journey to Scotland, or upon arrival. These Policies will allow these issues to be highlighted.</p> <p><u>Sex</u>: The Policies will mostly benefit women as they are the majority of victims of gender-based violence. However, the actions to achieve gender equality, greater knowledge of consent, positive gender role models and healthy relationships, and the actions to support victims and deal with perpetrators, will benefit everyone.</p> <p><u>Sexual Orientation</u>: Lesbian and bisexual women and girls experience violence, abuse, and exploitation which target their sexual orientation. Homophobia and biphobia can encourage VAWG (or be used by perpetrators as components of VAWG). This can also affect gay and bisexual men in the same way. These Policies will allow these issues to be highlighted.</p>	
---	--

**6. Impact – Fairer Scotland Duty**

What impact will the policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

<b>Positive impact</b> +	<b>Neutral impact</b> =	<b>Negative impact</b> -
<p>Yes</p>		

The implementation of these Policies should help to try and rectify the power imbalance between men and women and help towards eliminating unlawful harassment, victimisation and harassment endured by women and children which may lead to a greater take-up of finance/Benefits by women and children and therefore reduce their social-economic disadvantage.

**7. Impact – Inverclyde Alliance Partnership Plan 2023/33**

Which Themes from the Inverclyde Alliance Partnership Plan 2023/33 will the policy, function or strategy impact on?

<input type="checkbox"/>	<p><b>Theme 1: Empowered people</b></p> <ul style="list-style-type: none"> <li>• Communities can have their voices heard, and influence the places and services that affect them</li> <li>• Gaps in outcomes linked to poverty are reduced</li> </ul>
<input type="checkbox"/>	<p><b>Theme 2: Working people</b></p> <ul style="list-style-type: none"> <li>• More people will be in sustained employment, with fair pay and conditions</li> <li>• Poverty related gaps are addressed, so young people can have the skills for learning, life and work</li> <li>• Businesses are supported and encouraged to reduce their carbon footprint and develop green jobs</li> </ul>
<input type="checkbox"/>	<p><b>Theme 3: Healthy people and places</b></p> <ul style="list-style-type: none"> <li>• People live longer and healthier lives</li> <li>• Supportive systems are in place to prevent alcohol and drug misuse</li> <li>• Our natural capital is looked after, and we are effectively adapting and mitigating the effects of climate change</li> </ul>
<input checked="" type="checkbox"/>	<p><b>Theme 4: A supportive place</b></p> <ul style="list-style-type: none"> <li>• Vulnerable adults and children are protected and supported, ensuring they can live safely and independently</li> <li>• We recognise where people are affected by trauma, and respond in ways that prevent further harm and support recovery</li> <li>• Public protection and community safety are improved through targeting our resources to reduce the risk of offending and harm</li> </ul>
<input type="checkbox"/>	<p><b>Theme 5: A thriving place</b></p> <ul style="list-style-type: none"> <li>• Growth in our working age population by encouraging people to stay here, and attracting new people to settle here</li> <li>• Development of strong community-based services that respond to local need</li> <li>• Homes are energy efficient and fuel poverty is reduced</li> </ul>

	<ul style="list-style-type: none"> <li>• Increased use of active travel and sustainable transport options</li> <li>• Easy access to attractive and safe public spaces, and high-quality arts and cultural opportunities</li> </ul>
--	--

Theme 4: These Policies will assist anyone affected by gender-based violence in relation to the Protective Characteristics indicated at Section 3 and additional barriers such as addictions and mental health. This includes domestic abuse, rape, sexual assault, sexual abuse, sexual harassment, forced marriage, etc. Prevention of violence against women should advance equality of opportunity.

**8. Impact – Council Plan 2023/28**

**Which Themes from the Council Plan 2023/28 will the policy, function or strategy impact on?**

X	<p><b>Theme 1: People</b></p> <ul style="list-style-type: none"> <li>• Our young people have the best start in life through high quality support and education</li> <li>• Gaps in outcomes linked to poverty are reduced</li> <li>• People are supported to improve their health and wellbeing</li> <li>• More people will be in employment, with fair pay and conditions</li> <li>• Our most vulnerable families and residents are safeguarded and supported</li> </ul>
□	<p><b>Theme 2: Place</b></p> <ul style="list-style-type: none"> <li>• Communities are thriving, growing and sustainable</li> <li>• Our strategic housing function is robust</li> <li>• Our economy and skills base are developed</li> <li>• We have a sufficient supply of business premises</li> <li>• Our natural environment is protected</li> </ul>
X	<p><b>Theme 3: Performance</b></p> <ul style="list-style-type: none"> <li>• High quality and innovative services are provided, giving value for money</li> <li>• Our employees are supported and developed</li> </ul>

Themes 1 and 3: These Policies will mostly benefit women and girls as they are the majority of the victims of gender-based violence. However, the actions to achieve gender equality, greater knowledge of consent, positive gender role models and healthy relationships, should promote good relations between men and women. The aim to prevent and eradicate violence against women by men should improve relations between men and women. The accreditation programme underlines the Council’s commitment to supporting staff who experience violence and abuse.

**9. Evidence**

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens’ Panel, focus groups, interviews, projects, user feedback, complaints, Officers’ knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

<b>Evidence</b>	<b>Details</b>
Consultation/engagement (including any carried out while developing the policy, function, or strategy)	<p>The Corporate Equalities Group had oversight of the ESaW accreditation programme application process. A working group was set up to undertake the required actions to comply with the criteria to achieve accreditation.</p> <p>In addition, consultation took place with the Staff Disability Forum, the Workforce Development Group, the Women’s Forum and the Trade Union Liaison Group.</p>
Research	Internet and the Scottish Government and the COSLA Equally Safe Strategy 2023.
Officers’ knowledge and experience (including feedback from frontline staff)	Expertise, knowledge, and connections of the Violence Against Women Co-ordinator.

Equalities monitoring data	Equalities Mainstreaming data on the breakdown of Council staff by Protected Characteristics.
User feedback (including complaints)	
Stakeholders  Other	Gender disaggregated employee data was collected showing the composition of the workforce; occupation of full-time and part-time posts; and occupation of fixed-term and/or temporary posts.
Are there information gaps and, if so, what are these?	

## 10. Consequences of Analysis

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	<input checked="" type="checkbox"/>	The Policies and strategies will be reviewed on a three yearly basis and as required following any legislative changes.
b.	Continue development with minor alterations	<input type="checkbox"/>	
c.	Continue development with major changes	<input type="checkbox"/>	
d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	

How will the effect of the policy, function or strategy be monitored following implementation?

As part of the implementation and delivery of the EsaW accreditation programme, various groups have/are being established to help monitor and evaluate progress made with the initiative. The Corporate Equalities Group will continue to have oversight of the initiative and the Violence Against Women Co-ordinator and the VAWG Multi-Agency Partnership will have input into this.

When is the policy, function, or strategy due to be implemented?

Raising awareness of the accreditation programme has already started and will continue with an advertising campaign to raise awareness of the new section created on the Council’s intranet site. It was agreed with Close the Gap that the four Policies mentioned would not be implemented until they have Policy and Resources Committee approval which was granted at the Committee’s meeting on 4 June 2024.

When will the policy, function or strategy be reviewed?

Every three years unless legislative requirements bring this forward. The accreditation period for the EsaW Award lasts until 8 November 2025.

What resources are available for the implementation of the policy, function or strategy? Have these resources changed?

The strategy and Policies will be managed by Human Resources alongside other policies.

**11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.**

<b>Details of the Person(s) who completed the Assessment:</b>	
Name:	Alex Hughes/Sharon Sale
Position:	OD Team Leader/Violence Against Women Co-ordinator
Date:	18/07/24
<b>Authorised by:</b>	
Name:	Ruth Binks
Position:	Corporate Director – Education, Communities and OD
Date:	19/07/24

**Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at [karen.barclay@inverclyde.gov.uk](mailto:karen.barclay@inverclyde.gov.uk).**