

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.

1. Policy, function or strategy		
a.	Name/description of the policy, function or strategy ¹	Implementation of the payment of the Real Living Wage (RLW) to Inverclyde Council’s Modern Apprentices
b.	Responsible organisation(s)/Lead Service	Organisational Development (OD), Policy and Communications Service
c.	Lead Officer	Morna Rae, Head of OD, Policy and Communications
d.	Date of Impact Assessment	31 October 2024
e.	Partners/other Services involved in the development of the policy, function or strategy	Scottish Government
f.	Is the policy, function or strategy?	<input checked="" type="checkbox"/> New
		<input type="checkbox"/> 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, function or strategy or the substantive change to the policy, function or strategy)?	Fair Work First is a Scottish Government policy whose criteria includes applying fair work criteria to grants, other funding and public contracts being awarded by and across the public sector, where it is relevant to do so. The default position is that grant recipients awarded a public sector grant on or after 1 July 2023 are required as a minimum to pay at least the RLW from day one to all UK-based staff aged 16 and over, including Apprentices. The Council is in receipt of such contracts and is therefore required to comply with the Fair Work First qualifying criteria, following a temporary exemption in 2024/25.

¹ Please attach details of the policy, function or strategy to this Template

h.	What are the intended outcomes of the policy, function or strategy?	To drive high quality and fair work, and workforce diversity across the labour market in Scotland.	
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?	<input type="checkbox"/>	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?	No.	

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 (see Section 3)	X	
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty ² (see Section 6)	X	
c. Inverclyde Alliance Partnership Plan 2023/33 ³ (see Section 7)	X	

² [Fairer Scotland Duty: guidance for public bodies](#)

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

d. Council Plan 2023/28 ⁴ (see Section 8)	X	
3. If 'Yes' is selected for any part of Section 2, please populate the other relevant Sections of this Template.		
4. If 'No' is selected for <u>every part</u> of Section 2, please state the reasons for this.		
<p>Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy and Performance Officer: karen.barclay@inverclyde.gov.uk</p>		
Signature:	Date:	

3. Impact – Protected Characteristics						
Which of the Protected Characteristics will the policy, function or strategy have an impact upon?						
	Impact					
Protected Characteristic	Positive		Neutral	Negative		Reasons/Comments
	High	Low		High	Low	
Age	X			X		While Apprenticeships can often be aimed at 16-24 year olds, there are also opportunities for older age groups.

⁴ [Council Plan 2023/28](#)

Classification: Official

Care experienced			X			
Disability			X			
Gender Reassignment			X			
Marriage and Civil Partnership			X			
Pregnancy and Maternity			X			
Race			X			
Religion and Belief			X			
Sex			X			
Sexual Orientation			X			
Other groups to consider • Carers			X			

Classification: Official

• The Armed Forces Covenant Duty			X			
----------------------------------	--	--	---	--	--	--

4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?	
<input type="checkbox"/>	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

5. Impact – Groups	
From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.	
Positive impact + <i>(Describe groups affected.)</i>	Negative impact - <i>(Describe groups affected.)</i>
<u>Age:</u> The payment of the RLW to the Council’s Modern Apprentices will predominantly affect 16-24 year olds.	<u>Age:</u> The payment of the RLW to the Council’s Modern Apprentices may ultimately result in less opportunities for young people in Inverclyde as the budget for doing so is fixed, the net impact of which will necessitate a review of the number of Modern Apprentices employed by the Council in the future.

6. Impact – Fairer Scotland Duty

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

Positive impact +	Neutral impact =	Negative impact -
+		
<p>Briefly describe how the policy, function or strategy will impact on reducing inequalities of outcome.</p> <p>The implementation of the payment of the RLW to the Council’s Modern Apprentices will result in an increase in their respective households’ income which is recognised as a driver to improve inequalities of outcome.</p>		

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>Theme 1: Empowered people</p> <ul style="list-style-type: none"> • Communities can have their voices heard, and influence the places and services that affect them • Gaps in outcomes linked to poverty are reduced
<input checked="" type="checkbox"/>	<p>Theme 2: Working people</p> <ul style="list-style-type: none"> • More people will be in sustained employment, with fair pay and conditions • Poverty related gaps are addressed, so young people can have the skills for learning, life and work • Businesses are supported and encouraged to reduce their carbon footprint and develop green jobs
<input type="checkbox"/>	<p>Theme 3: Healthy people and places</p> <ul style="list-style-type: none"> • People live longer and healthier lives • Supportive systems are in place to prevent alcohol and drug misuse

	<ul style="list-style-type: none"> • Our natural capital is looked after, and we are effectively adapting and mitigating the effects of climate change
□	<p>Theme 4: A supportive place</p> <ul style="list-style-type: none"> • Vulnerable adults and children are protected and supported, ensuring they can live safely and independently • We recognise where people are affected by trauma, and respond in ways that prevent further harm and support recovery • Public protection and community safety are improved through targeting our resources to reduce the risk of offending and harm
X	<p>Theme 5: A thriving place</p> <ul style="list-style-type: none"> • Growth in our working age population by encouraging people to stay here, and attracting new people to settle here • Development of strong community-based services that respond to local need • Homes are energy efficient and fuel poverty is reduced • Increased use of active travel and sustainable transport options • Easy access to attractive and safe public spaces, and high-quality arts and cultural opportunities

Briefly describe how the policy, function or strategy will impact on the Inverclyde Alliance Partnership Plan 2023/22 Themes.

Theme 2: The payment of the RLW supports the delivery of this Theme, given that it provides the Council’s Modern Apprentices with fair pay.

Theme 5: Those who live on lower incomes may spend their resources on local services and in local businesses; the expectation is therefore that the payment of the RLW to the Council’s Modern Apprentices will, in part, aid the local economy, and contribute to the promotion of Inverclyde as a good place to live.

8. Impact – Council Plan 2023/28

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

X	<p>Theme 1: People</p> <ul style="list-style-type: none"> • Our young people have the best start in life through high quality support and education • Gaps in outcomes linked to poverty are reduced • People are supported to improve their health and wellbeing • More people will be in employment, with fair pay and conditions
---	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<ul style="list-style-type: none"> • Our most vulnerable families and residents are safeguarded and supported
□	<p>Theme 2: Place</p> <ul style="list-style-type: none"> • Communities are thriving, growing and sustainable • Our strategic housing function is robust • Our economy and skills base are developed • We have a sufficient supply of business premises • Our natural environment is protected
X	<p>Theme 3: Performance</p> <ul style="list-style-type: none"> • High quality and innovative services are provided, giving value for money • Our employees are supported and developed

Briefly describe how the policy, function or strategy will impact on the Council Plan 2023/28 Themes.

Theme 1: The payment of the RLW supports the delivery of this Theme, given that it provides the Council’s Modern Apprentices with fair pay.

Theme 3: The aim of the Fair Work First initiative is to drive high quality and fair work, and workforce diversity across the labour market in Scotland. The Council supports the delivery of this aim via the implementation of its People and OD Strategy 2024/27 and, specifically, across the following Themes: ‘Employee skills development, leadership, succession planning - Employees are our most valuable resource’; ‘Employer of choice - Continuous improvement’; and ‘Fairness and equality - Promoting equality, dignity and respect’.

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.

Evidence	Details
----------	---------

<p>Consultation/engagement (including any carried out while developing the policy, function or strategy)</p>	<p>Some Scottish Local Authorities already pay the RLW to their Modern Apprentices, while others have similar exemptions to one that the Council currently has.</p> <p>Recipients of Fair Work First grants must provide appropriate channels for effective workers' voice such as Trade Union recognition, staff engagement mechanisms and employee forums; the Council has a number of employee consultation and engagement methods in place.</p>
<p>Research</p>	<p>The National Living Wage provides a base income which aims to protect workers' rights. The RLW is a voluntary wage rate independently calculated by The Resolution Foundation on behalf of the Living Wage Foundation.</p>
<p>Officers' knowledge and experience (including feedback from frontline staff)</p>	<p>Historically, Officers are aware that local stakeholders have emphasised the importance they place on the creation and retention of good quality jobs, especially for young people in Inverclyde, with the aim of retaining and enhancing the local population. With this in mind, the Council identified an investment for 2025/26 to support the payment of the RLW to its Modern Apprentices.</p>
<p>Equalities monitoring data</p>	<p>While Apprenticeships can often be aimed at 16-24 year olds, there are also opportunities for older age groups. Modern Apprentices can work in a number of areas of the Council, ranging from early years' centres to horticulture, joiners, electricians, technicians, customer service and business and administration.</p> <p>The current rates of pay for a first year of Modern Apprenticeship irrespective of age is £10.62 per hour. After one year and one day they move to £11.06 per hour or National Living Wage of £11.44 per hour if aged 21 or over.</p> <p>At present, the Council has 35 Modern Apprentices, some of whose contracts will end prior to 1 April 2025, while there are 14 whose contracts will continue into 2025/26.</p>

User feedback (including complaints)	
Stakeholders	
Other	
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"/>	It is proposed that the implementation of the payment of the RLW to the Council's Modern Apprentices takes place in April 2025.
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?

The monitoring of the implementation of the payment of the RLW to the Council's Modern Apprentices will be done via the human resources and budget monitoring procedures in place at the Council.

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

The policy will be implemented in April 2025, following agreement by the Policy and Resources Committee at its meeting on 19 November 2024.

When will the policy, function or strategy be reviewed?

The payment of the RLW to Modern Apprentices will be reviewed when prompted by legislative or other requirements.

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

The Council identified a budget for 2025/26 to support the payment of the RLW to its Modern Apprentices.

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.

If the Council, and any organisation in receipt of Scottish Government grants administered by the Council, does not implement the payment of the RLW to the Modern Apprentices, they would not meet the Fair Work First qualifying criteria. Consequently, the Council would not be able to access and administer a range of key funding streams including, for example, those which support the delivery of economic development activities in the local area.

Details of the Person(s) who completed the Assessment:	
Name:	Morna Rae; Stuart Jamieson
Position:	Head of OD, Policy and Communications; Director – Environment and Regeneration
Date:	31 October 2024
Authorised by:	
Name:	Ruth Binks
Position:	Corporate Director – Education, Communities and OD
Date:	3 November 2024

Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at karen.barclay@inverclyde.gov.uk.