

Equality and Fairer Scotland Impact Assessment - Process

STEP 1 - Screening

As early as possible as the policy is being developed, screen it!

- Describe the policy
- Is an EFSIA needed?



STEP 2 – Scoping - Determine what is needed for the EFSIA

- What do you already know?
- What further information do you need?

STEP 3 – As the policy is being developed

- Review the information already available
- Gather any additional information needed
- Consult with stakeholders

STEP 4 – Decision

- Review findings
- Revisit the policy and make a decision/recommendation:
 - Option 1: No major change
 - Option 2: Adjust the policy
 - Option 3: Continue the policy
 - Option 4: Stop and remove the policy
- Record the reasons for the decision/recommendation

Equality and Fairer Scotland Impact Assessment - Screening

Title of Policy:	Clackmannanshire Council Budget 2024/25
Service:	Clackmannanshire Council
Team:	N/a

Will the policy have to go to Council or committee for approval	Yes
Is it a major policy, significantly affecting how functions are delivered?	Yes
Does it relate to functions that previous involvement activities have identified as being important to particular protected groups?	Yes
Does it relate to an area where the Council has set equality outcomes?	No
Does it relate to an area where there are known inequalities?	Yes
Does it relate to a policy where there is significant potential for reducing inequalities or improving outcomes?	Potentially

IF YES - Move on to an Equality & Fairer Scotland Assessment

IF NO - Explain why an Equality & Fairer Scotland Assessment is not required

APPROVAL

NAME	DESIGNATION	DATE
Cherie Jarvie	Senior Manager Partnership and Transformation	11/01/2023

NB This screening exercise is not to be treated as an assessment of impact and therefore does not need to be published. However, if you decide not to assess the impact of any policy, you will have to be able to explain your decision. To do this, you should keep a full record of how you reached your decision.

Equality and Fairer Scotland Impact Assessment - Scoping

Purpose of the proposed policy or changes to established policy

The purpose of the change is to ensure that Clackmannanshire Council is able to set a balanced budget, as required by statute, for the year 2024/25 and to meet a funding gap of £11.56m.

Clackmannanshire Council is consulting on proposals which require a policy change and this Equality and Fairer Scotland Impact Assessment scoping document sets out the Council's initial assessment on any potential impacts arising from proposals. Feedback from our consultation process will inform the final Equality and Fairer Scotland Impact Assessment which will be published on the Council's webpages and will be included as part of the final decision making process on the 24/25 budget by Council.

As in previous years, a budget engagement process is being undertaken to inform decisions for the 2024/25 budget. We are consulting on a range of policy proposals which seek to contribute to the funding gap for 24/25. The proposals are summarised below:

- a) Increase in Fees and Charges by 6.7%
- b) Rent review for commercial properties
- c) Review of licensing charges
- d) Introduction of new charges for supporting commercial events
- e) Increase charges for leisure services by 10%
- f) Implement council tax on second homes.
- g) School Meals cost increase
- h) Stop funding to community Halls on phased basis by 26/27.
- i) Reduce Third Sector funding for Children's Services
- j) Review of leisure services
- k) Review of customer services and libraries.
- l) Review of school management
- m) Review community learning and development service
- n) Review of educational psychology service
- o) Review of home to school transport
- p) Review of primary school classes
- q) Change school janitor arrangements
- r) Reduce winter service
- s) Reduce land maintenance
- t) Reduce levels of street cleaning

Through the budget engagement exercise we are seeking to consult with protected groups to identify specific equality and Fairer Scotland impacts and any mitigations that we need to consider under our equalities duties. Details on the proposals are set out in the Budget Engagement Booklet 24/25 which can be accessed on our consultation webpage.

Copies of previous equality and Fairer Scotland impact assessments can be accessed on our website here <https://www.clacks.gov.uk/council/eqia/> and information on previous budget consultations can be found here <https://clackmannanshire.citizenspace.com/>

The current rate of charges can be found on our website <https://www.clacks.gov.uk/>

Which aspects of the policy are particularly relevant to each element of the Council's responsibilities in relation to the General Equality Duty and the Fairer Scotland Duty?

General Equality Duty -

➤ **Eliminating unlawful discrimination, harassment and victimisation and other prohibited conduct**

Impacts are assessed as low, however data and evidence on impacts is invited as part of the consultation process.

➤ **Advancing equality of opportunity between people who share a relevant protected characteristic and those who do not**

The proposed changes may have an impact on those with protected characteristics and further information is required to better understand any direct impacts on protected groups and how these could reasonably be mitigated. Clackmannanshire Council is seeking to consult with protected groups to gather information on likely or potential impacts arising from the proposals.

A number of budget proposals are identified which may have impacts on protected groups. These include:

Increase charges for leisure services by 10%

School Meals cost increase

Stop funding to community Halls on phased basis by 26/27.

Reduce Third Sector funding for Children's Services

Review of leisure services

Review of customer services and libraries.

Review of community learning and development service

Review of educational psychology service

Review of home to school transport

Review of primary school classes

Change school janitor arrangements

Reduce levels of street cleaning

➤ **Fostering good relations between people who share a protected characteristic and those who do not.**

There are potential impacts, however data and evidence is invited as part of the consultation process. The proposals which may impact this part of the duty include: funding to community halls; funding to Children's Services; review of community learning and development; review of educational psychology; change to school janitorial arrangements.

Fairer Scotland Duty -

➤ **Reducing inequalities of outcome caused by socioeconomic disadvantage**

Residents experiencing socio economic disadvantage may be disproportionately impacted by proposals included in the budget engagement for 24/25, however a range of mitigations are already in place to protect these residents. Further information, data and evidence is invited as part of the consultation process to understand impacts and any additional reasonable mitigation that can be put in place.

A number of budget proposals are identified which may have impacts on residents experiencing or likely to experience social or economic disadvantage. These are:

Increase in Fees and Charges by 6.7%

Increase charges for leisure services by 10%

School Meals cost increase

Stop funding to community Halls on phased basis by 26/27.

Reduce Third Sector funding for Children's Services

Review of leisure services

Review of customer services and libraries.

Review of community learning and development service

Review of educational psychology service
Review of home to school transport
Change school janitor arrangements
Reduce levels of street cleaning

The proposed changes may increase the charges residents pay for services. Whilst these are universal charges the change may disproportionately impact residents who are vulnerable or experience socio-economic disadvantage. A range of support schemes are already in place to ensure that the most vulnerable residents are protected from financial crisis including Council Tax Reduction, crisis and financial welfare and concessionary schemes. However we are mindful of the current cost of living pressures and as such further information is sought from protected groups on impacts and any additional mitigation that the Council should consider.

The proposed changes include funding to community halls and funding for Children's Services which includes Young Carer's Project and Alloa Community House. Users of these projects and services are likely to include residents experiencing socio economic disadvantage and also potentially fall under one or more protected characteristic. Impacts on residents experiencing socio economic disadvantage are possible with a reduction of funding to the Community House given its geographic location in Alloa South and East and the services provided to local residents who may also have protected characteristics. Further information is sought on impacts and potential mitigation.

Proposals on a review of customer services and libraries provision and a review of leisure services could potentially have a disproportionate impact on protected groups and those already experiencing or likely to experience socio economic disadvantage, however further information is sought from protected groups on impacts and any mitigation that the Council should consider.

Proposal relating to the increase in cost of school meals; review of home to school transport; and a review of school janitor arrangements may potentially impact protected groups and those already experiencing or likely to experience socio economic disadvantage.

A review of community learning and development services and review of educational psychology service could potentially have a disproportionate impact on protected groups and those already experiencing or likely to experience socio economic disadvantage however further information is sought on impacts and potential mitigation.

Proposals relating to a reduction in levels of street cleaning may have a disproportionate impact on protected groups however further information is sought to understand the extent of any impact and potential mitigation.

To which of the equality groups is the policy relevant?		
Protected Characteristic	Yes/No*	Explanation
Age	Yes	There may be disproportionate impacts on certain age groups. Proposals relating to the increase in cost of school meals; review of primary school classes; review of home to school transport; review of school management and review of school janitor arrangements are likely to impact on children and young people. Proposals relating to a review of community learning and development service and educational psychology service are also likely to impact children and young people. Proposals relating to customer services and libraries, funding to community halls and leisure services may disproportionately impact older residents. Proposals relating to funding for Children's Services are likely to impact children and young people.
Disability	Yes	There may be disproportionate impacts on people with disabilities arising from a number of proposals particularly where unemployment and low incomes are prevalent. Review of community learning and development, review of educational psychology, review of funding to Children's Services and a reduction in level of street cleaning may impact on people with a disability. Further information is sought to understand impacts and to identify mitigation.
Gender Reassignment	Potentially	There may be disproportionate impacts on people proposing to undergo, undergoing or having undergone a process to reassign their sex (as defined in the Equality Act 2010). Proposals relating to a review of community learning and development and education psychology may impact this protected characteristic however this is assessed as likely to be low.
Pregnancy and Maternity	No	There is no indication at this stage that this protected characteristic would be impacted.
Race	No	Proposals relating to provision of support for residents for whom English is not their first language may affect this protected characteristic. These proposals relate to Community Learning and Development, Educational Psychology and potentially review of customer services and libraries.
Religion and Belief	No	There is no indication at this stage that this protected characteristic would be impacted.
Sex	Yes	There may be disproportionate impacts on sex. Our poverty and economic baseline assessment indicates that weekly incomes for women are relatively low. Women also represent the majority of lone parent families in Clackmannanshire. Proposals relating to a review of third and voluntary sector organisations may disproportionately impact women however further information is sought to understand impacts and any additional mitigation the Council should consider.
Sexual Orientation	Potentially	There may be disproportionate impacts on sexual orientation (as defined in the Equality Act 2010). Proposals relating to a review of community learning and development and education psychology may impact this protected characteristic however this is assessed as likely to be low.

What evidence is already available about the needs of relevant groups, and where are the gaps in evidence?

Our analysis indicates that low incomes, poverty and inequality and health inequality are significant issues for Clackmannanshire possibly worsened by cost of living pressures. Previous data deep-dives and impact assessments have been carried out to help inform our understanding of Clackmannanshire and we continue to improve the ways that we use data to help with strategic decision making.

In addition data and evidence from previous budget engagement activity, as well as other consultation, is retained on record and is reviewed as part of the Equality and Fairer Scotland Impact Assessment process.

Whilst we have data and evidence from previous budget engagement which has indicated that similar proposals had no significant impact on residents, there are evidence gaps which relate to the full proposals set out in this document. We also recognise that circumstances change and as such seek to gather additional information on the needs of relevant groups, impacts relating to the proposals and any reasonable mitigation that the Council should consider.

Which equality groups and communities might it be helpful to involve in the development of the policy?

The Council is seeking views from protected groups, and in particular from: young and older residents; those with a disability; those from ethnic minority groups; sex, sexual orientation and gender reassignment persons and groups; individuals and groups experiencing economic disadvantage, low income families and/ or communities and from organisations supporting residents with protected characteristics. We are also seeking views from residents in deprived communities or areas which have high levels of social or economic disadvantage. We are seeking information on any impacts arising from the proposals and any additional reasonable mitigation that we should consider.

We will update and publish this impact assessment following completion of the budget consultation exercise and analysis of feedback. The final impact assessment and all feedback and evidence will be considered by Council as part of its budget setting process for 2024/25.

Next steps

We are seeking views through our online survey which can be accessed here: <https://www.clacks.gov.uk/>

Alternatively views on impacts can be sent in writing to: customerservice@clacks.gov.uk

or

Customer Services
Kilncraigs
Greenside Street
Alloa
FK10 1EB

If you require this document in an alternative language or format please contact Clackmannanshire Council on 01259 450000, email customerservice@clacks.gov.uk or write to us at the above address.

Equality and Fairer Scotland Impact Assessment - Decision

Evidence findings

A range of evidence has been supplied and reviewed as part of the budget engagement activity carried out between 22 January and 18 February 2024. All evidence has been shared in full with elected members as part of the decision making process. In the context of equality and Fairer Scotland impacts summary findings are set out below:

Evidence suggests that there may be equality impacts in relation to:

- Eliminating unlawful discrimination, harassment and victimisation and other prohibited conduct;
- Advancing equality of opportunity between people who share a relevant protected characteristic and those who do not;
- Reducing inequality of outcome caused by socio-economic disadvantage.

These relate to the following proposals:

Review of Customer Services and Libraries

This proposal seeks to set out a sustainable model for customer services that is better able to respond to changing citizen needs and lifestyles within a context of tightening financial constraint. This includes investment in greater digital services and reducing the number of community access points (CAPs) and libraries to better align with demand. The Council currently runs five libraries and CAPs. This proposal would involve the CAP and libraries at Ben Cleuch in Tillicoultry and Sauchie Hall closing in 2024/25. These buildings would be made available for community asset transfer. Face to face customer services would be maintained at Council headquarters, with the CAP service at the Speirs Centre (Alloa Rent Office) being centralised at Kilncraigs when reception re-opens. The library service would remain open at the Speirs Centre, but opening hours would reduce. The number of customer service advisers working in the Council's contact centre will gradually reduce, with vacancies not being filled.

Evidence provided through the budget engagement highlights impacts on older residents who access face to face services in the CAPs and who make use of library services in Tillicoultry and Sauchie. Specific impacts are focussed around digital exclusion, the potential for social isolation and limitations of public transport to easily access face to face services elsewhere particularly in the context of older residents and those with disabilities. There may also be financial impacts for residents travelling elsewhere to access face to face services and library services as well as financial impacts resulting from utilising digital services. Impacts were also noted on the range and type of services provided in both Tillicoultry and Sauchie including ESOL classes, literacy classes and exercise classes with evidence that specific protected groups would be impacted by the proposals. Additionally in the case of Sauchie CAP some evidence was included on the socio-economic (and Fairer Scotland) impacts given the deprivation profile of some parts of the community.

Contained within the proposal is consolidation of Customer Access Point as part of the reopening of Kilncraigs reception and integrated CAP, and consolidation of library services and web4u in the Speirs Centre. Other library services including e-books and the housebound service will continue to be provided ensuring continued offering of services for people who would find travel to Alloa difficult or for those with significant or pervasive disability. Whilst the Council recognises the impacts of these proposals on protected groups a number of mitigations are in place to maintain service delivery including alternative locations and venues where possible.

Furthermore the revised proposal includes plans to defer implementation of potential CAP closures until 2025 to enable further dialogue with communities, local community groups and partners on potential alternative service delivery models similar to those that have been successful in other areas in Clackmannanshire. Those discussions will continue throughout 24/25 and beyond.

Review of Leisure Services

The proposal includes a review of leisure staffing levels to create a more flexible service delivery model consolidated primarily on Alloa Town Hall and the 3 academies, with withdrawal of leisure services at Sauchie Hall and Ben Cleuch Centre in Tillicoultry. As with the previous proposal the Council will defer implementation of any potential closures until 2025 to enable further dialogue with communities, local community groups and partners on potential alternative service delivery models, similar to those that have been successful in other areas in Clackmannanshire. Where possible leisure classes will be delivered in other venues in Clackmannanshire. No specific impacts have been identified which relate to this proposal or which have not been included under Review of Customer Services and Libraries.

Voluntary and Third Sector Organisations

This proposal based on an independent strategic needs analysis and review includes removing the £10,000 discretionary award scheme given to the Young Carers Project and removing the £34,760 given to Alloa Community House to support early preventative services. Both organisations have provided written feedback to the Council which has informed this impact assessment.

In the case of Alloa Community House it is clear that they provide services to some of the most vulnerable individuals and families with both protected characteristic and who are faced with significant socio-economic barriers. This includes people with disabilities, health and mental health inequalities, additional support needs and experience of trauma. This also includes work with young people. Alloa Community House is situated in the heart of Alloa South and East which experiences the highest levels of deprivation across Clackmannanshire and supports families and individuals from this area who are in workless or low income households, face financial hardship and other inequalities including health.

From the evidence reviewed there is no suggestion that the proposal will lead to closure of the Alloa Community House, or significantly affect service delivery. The Council has sought to identify alternative sources of funding for Alloa Community House and has highlighted areas of service provision which aligns with available funding opportunities. In 2023/24 Alloa Community House was awarded an additional £117,265 of Scottish Government funding through the Child Wellbeing Partnership. Clackmannanshire Council is awaiting confirmation from Scottish Government about the level of this funding for 2024/25, but it is hoped that the Community House will receive an increase from this funding next year.

The Young Carers project which is affected by the proposal provides discretionary funding for activities for young people supported by the wider Young Carers project. This affects a number of young people aged 8-14 years who provide care, and enables them to access activities twice a year. Evidence of impacts and potential mitigation has been submitted by young carers and has been used to shape this impact assessment. Whilst the proposal includes removal of the discretionary grant funds which enables the creation of young carers statements and ensures that Young Carers are supported and enabled to live a more enjoyable life while continuing in their caring role.

Fees and Charges

There is no evidence of disproportionate equalities or Fairer Scotland impacts arising from this proposal. Whilst these are universal charges, significant support is already in place to mitigate impacts affecting vulnerable residents or people with socio economic factors. This includes a range of support schemes already in place to ensure that the most vulnerable residents are protected from financial crisis including Council Tax Reduction, crisis and financial welfare and concessionary schemes.

Review of community learning and development service

The proposal includes a review of Community Learning and Development which incorporates youth work, community based adult learning, English as a second language (ESOL), and community development support. This service provides support to some of the most vulnerable children and young people in Clackmannanshire including those affected by poverty, deprivation and inequality. The proposal includes a reduction in staffing numbers which will result in a reduction or change to services previously provided. Evidence submitted as part of the engagement suggests equality groups will be impacted by this proposal including those from ethnic minority backgrounds, young people and those with a disability. This proposal is also likely have negative Fairer Scotland impacts around attainment, adult learning and youth work. The Council will seek to ensure that services are prioritised where they are needed the most including delivery of services in localities with priority around early intervention. Additionally, the service has reviewed their delivery of ESOL, including working collaboratively with Forth Valley College and Third Sector partners to ensure that learners are placed in the most appropriate classes for their level of need, and where appropriate wider support including wellbeing, employability, family and other supports are provided effectively.

Review of educational psychology service

The proposal includes a reduction in educational psychologists to work with families, schools, ELCs and other professionals to help meet children and young people's educational needs. This service provides support to some of the most vulnerable children and young people in Clackmannanshire likely to include those with disabilities and/or health and mental health inequality. This proposal may also have Fairer Scotland impacts particularly the poverty attainment gap and supporting young people's mental health and wellbeing. The Council will seek to ensure that services are prioritised to those who need them most and to minimise impacts wherever possible. In addition pupils in schools have access to increased mental health support from Counselling Services and Wellbeing workers as well as access to mental health support 24/7 through an on line platform called Kooth.

Review of primary school classes

This proposal will increase class sizes in some schools to reflect falling school rolls in primary schools and which will reflect teacher to pupil ratio's in other authorities in Scotland. Primary school rolls have reduced in Clackmannanshire by 6% over the past 2 years and the Council currently has the lowest number of pupils to teachers in Scotland. Whilst this change impacts children and young people, no specific evidence on equalities impacts was submitted as part of the engagement. Some Fairer Scotland impacts were identified, namely poverty attainment gap impacts, however schools in the most deprived areas in Clackmannanshire will not be impacted by this change. As the reduction equates to less than 2% of the total number of primary school teachers it is assessed that the impact on pupil attainment will be low.

Change school janitor arrangements

No specific equalities or Fairer Scotland impacts were identified relating to this proposal from evidence submitted.

Reduce levels of street cleaning

No specific equalities or Fairer Scotland impacts were identified relating to this proposal from evidence submitted.

School meals cost increase

This proposal will increase the cost of a school meal by 25 pence, from £2.20 to £2.45. This will impact on P6 and P7 pupils whose families do not qualify for free school meals. There is a universal provision of free school meals to all P1 to P5 pupils. Roll out of free school meals to include P6 and P7 will take place in line with Scottish Government guidance and associated funding. A range of support schemes are in place to ensure that the most vulnerable residents are protected from financial crisis including Council Tax Reduction, crisis and financial welfare and concessionary schemes. No specific equalities or Fairer Scotland impacts were identified relating to this proposal from evidence submitted, however families who are not in receipt of free school meals may feel the impact of the proposed price increase.

Details of engagement undertaken and feedback received

Budget Engagement carried out on Citizen Space between 22 January and 18 February 2024. Responses and feedback received from 938 residents.

Targeted engagement with Youth Council/pupils with feedback provided from 198 young people in Clackmannanshire.

Attendance at community events with Sauchie residents and Young Carers.

Written representation from some Community Councils

Written representation from Alloa Community House

Written representation from Young Carers

Written representation from SLIC

Written representation from individual residents

Petition relating to Sauchie Hall (received on 22 Feb)

Decision/recommendation

Having considered the potential or actual impacts of this policy, the following decision/recommendation is made:

Tick	Option 1: No major change The assessment demonstrates that the policy is robust. The evidence shows no potential for unlawful discrimination and that all opportunities have been taken to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.
X	Option 2: Adjust the policy – this involves taking steps to remove any barriers, to better advance equality or to foster good relations. It may be possible to remove or change the aspect of the policy that creates any negative or unwanted impact, or to introduce additional measures to reduce or mitigate any potential negative impact.
	Option 3: Continue the policy – this means adopting or continuing with the policy, despite the potential for adverse impact. The justification should clearly set out how this decision is compatible with the Council's obligations under the duty.
X	Option 4: Stop and remove the policy – if there are adverse effects that are not justified and cannot be mitigated, consideration should be given to stopping the policy altogether. If a policy leads to unlawful discrimination it should be removed or changed.

Justification for decision

The following proposals that were consulted on and subsequently **removed** are:

1. Review of home to school transport

The following proposals that were consulted on and subsequently **adjusted** are:

2. Review of customer services and libraries.

This proposal was adjusted and deferred for 12 months to enable engagement and consultation to take place with impacted communities.

All other proposals outlined in this impact assessment were agreed. Where equality or fairer Scotland impacts have been identified, mitigations are either in place, or being taken to minimise the impacts on affected groups (see evidence findings). These relate to the following changes:

Increase in Fees and Charges by 6.7%
School Meals cost increase
Stop funding to community Halls on phased basis by 26/27.
Reduce Third Sector funding for Children's Services
Review of leisure services
Review of school management
Review community learning and development service
Review of educational psychology service
Review of primary school classes

APPROVAL

NAME	DESIGNATION	DATE
Cherie Jarvie	Senior Manager Partnership and Transformation	18/03/2024