

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Customer and Communities		
Service Area:	Equalities, Access & Inclusion		
Name of the proposal :	Anti-Racism & Inclusion Strategy and Action Plan		
Lead officer:	Pauline Stuchfield		
Date assessment completed:	12 th November 2023		
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Pauline Stuchfield	Director of Customer & Communities	City of York Council	Director
Using work of IERUK 3.0			

Laura Williams	Assistant Director of Customer, Communities & Inclusion	As above	Communities & Inclusion
CYC BARMC staff Group	Confidential	As above	-
CYC Wider workforce			

Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	This report provides a plan of action as the City of York Council's (CYC) response to the Anti-Racism and Inclusion Strategy which was presented to and approved by Executive and full Council in July 2023. A commitment was made to provide a further report to Executive in response to the strategy, <i>making recommendations for change where actions can be implemented in the short term and also identifying medium and longer-term measures.</i>

1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	Equalities Act and Human Rights legislation compliance. The council will adopt compliance with the Equalities Framework for Local Government in developing policy and practice.

1.3	Who are the stakeholders and what are their interests?
	<p>All employees and particularly those who are from BARM Communities (BARMC).</p> <p>All residents in the city using council services and affected by racism in York particularly people of colour but also with other minority ethnic backgrounds, also those who are covered by other protected characteristics under equalities legislation as the independent review was carried out by an inter sectional task group.</p> <p>All York city partners</p> <p>All employers/businesses and education /skills partners in relation to the items contained in the strategy and action plans</p>

<p>1.4</p>	<p>What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Priorities and other corporate strategies and plans.</p>
	<p>Through the proposals in the report the Executive is recommended to:</p> <ol style="list-style-type: none"> 1. Executive members are asked to approve the initial CYC Anti Racism Action Plan attached including: <ul style="list-style-type: none"> • Actioning the output from workforce race equality impact assessment which will inform further plans; • Review further the Anti Racism and Equality Strategy findings and recommendations relating to Housing, Schools and Social Care and work with directorate management teams on dedicated responses; • Continue to engage with the council’s Black, Asian and Racially Minoritised Communities (BARMC) staff group and wider workforce to inform strategy, policy and process change; and • Work with city partners and IERUK 3.0 on city wide solutions. <p>The outcomes required relate to meeting the council’s 4 core commitments:</p> <ol style="list-style-type: none"> 2. This work will contribute to the council’s core commitments around: <ol style="list-style-type: none"> a. Equalities & Human Rights – this report focuses not only people of colour, those from ethnic minority backgrounds but also intersectional representation and multi complex needs – see Equalities Impact Assessment attached. b. Affordability – systemic and institutional racism can impact on access to jobs, skills development and economic opportunity and so any improvements made will have direct benefits of the financial and economic wellbeing of the community

- c. **Climate & Environment**– there are no likely direct impacts on the Environment of this report although celebration of culture and the city’s black and ethnic history will bring a positive contribution to our community places and spaces.
- d. **Health** – there are known health disparities for people of colour and ethnic minority groups and any improvement in opportunity impacting on health and wellbeing will have a positive impact on the community.

Specific related priorities in the Council Plan are:

Equalities and Human Rights - Equality of opportunity

We will create opportunities for all, providing equal opportunity and balancing the human rights of everyone to ensure residents and visitors alike can benefit from the city and its strengths. We will stand up to hate and work hard to champion our communities.

Specific priorities:

- *Celebrate being a Human Rights City with an Anti-Racism Action Plan*
- *Be recognised by LGA as “excellent” in Equalities, Diversity and Inclusion.*

- 3. The impact of structural inequalities and racism, however will have an impact on every element of the Council Plan and associated policies.

Step 2 – Gathering the information and feedback

<p>2.1</p>	<p>What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.</p>	
<p>Source of data/supporting evidence</p>	<p>Reason for using</p>	
<p>All the data is contained in the detailed report at 30423+IERUK+Anti-Racism+Strategy+Document+WEB.pdf (squarespace.com)</p>	<p>The actions in the strategy document are based on the date in the report and the earlier data report quoted <i>A Snapshot View of Racial Disparity in the City of York</i> published by IERUK in February 2023</p>	
<p>Results from IERUK’s engagement with the council’s leadership group in early June 2023.</p>	<p>Contained in the report in the above link this feedback has been used to shape some of the actions in the report.</p>	
<p>June 2023 Feedback from the council’s own Black, Asian & Racially Minoritised Communities staff group</p> <ul style="list-style-type: none"> • Majority of the group like working for York, people are friendly and some people have gained opportunities to progress. • There are some really good champions and allies across the Council and we should grow these. • Really pleased with York recognising the existence of racism and moving to become a anti racist city. <p>However there needs to be a real focus on</p> <ul style="list-style-type: none"> • Racism what does that mean and how micro and macro aggressions can affect people who are a minority 	<p>This feedback, whilst positive in terms of the initial findings confirmed and mirrored some of the evidence contained in IERUK’s report confirming that the council needs to think seriously about its understanding of racism, its impacts on staff, need for open discussions on colour and race and acceptance of difference, recruitment and retention policies and processes, empowering and developing of all staff confidence to stand up to racism and unacceptable behaviour, and the need to lead change in a city where racism is prevalent.</p>	

<ul style="list-style-type: none"> • Open discussions about colour and race • Recruitment of diverse groups but most importantly retention • Acceptance of difference • Many of the group are really conscious that people are more ready to complain about them than other team members but equally do not feel empowered to complain if they have an issue. • Other raised that they felt welcomed by the Council however felt that racism is very prevalent within the city in particular those who live in York. 	
<p>October 2023 staff feedback (not verbatim)</p> <p>The following should be priorities as they are elsewhere in Health and Local Government:</p> <ul style="list-style-type: none"> • investigate the reasons behind the low proportion of BARMC employees and take steps to actively increase diversity in the workforce, for example reviewing recruitment policies and practices to ensure they are inclusive and accessible to all. • explore whether BARMC individuals are concentrated in particular tasks or at particular levels within the workforce and take action to address any inequalities, including reviewing promotion and leaving issues. 	<p>Lived experience giving consistent conclusions as above. The priority points for the action plan mentioned more than once are:</p> <ul style="list-style-type: none"> • investigate the reasons behind the low proportion of BARMC employees and take steps to actively increase diversity in the workforce, for example reviewing recruitment policies and practices to ensure they are inclusive and accessible to all. • explore whether BARMC individuals are concentrated in particular tasks or at particular levels within the workforce and take action to address any inequalities, including reviewing promotion and leaving issues.

- employ a Diversity and Inclusion team to ensure highlighted barriers are adequately addressed
- deliver diversity training for all councillors.

The following may lead to better and fairer BARMC representations in city leadership.

- Stages of recruitment process including wording in the Job advertisement needs to be looked into by a person that understands what CYC is looking for.
- It is important for senior leaders to build a trust and be able to give opportunity to people of colour to excel or given an opportunity to develop whether academically or practically.
- Widen the search.
- BARMC skills, experience and behaviours are to be considered thoroughly in the recruitment process – especially during marking and scoring. The current high scoring strategy can be misleading, especially in an interview for internal vacancies.
- CYC promote progression when possible
- BARMC candidates benefit more if employment records (current when internal vacancy is advertised) including supervision notes PDRS, attendance management are reviewed as part of the recruitment process. This should be considered as equally as

important to what is being put forward during the interview.

- BARMC candidates often can walk into an interview with a lots of apprehensions based on their relationship with the interviewing panels (especially if the panel is not independent) which can affect the answers provided during interview. External interviewers (not related to same work settings) should constitute the interview panels.
- Promote a more diverse leadership and shape our workforce for all of our children coming through.
- Training and awareness for all levels of workforce within CYC on diversity should be a key.
- Leadership to encourage friends and colleagues of non-colour to be able to ask questions about diversity eg the BHM background on the teams meeting or anti racism pledge,
- Make it a common practice to share our support on Anti racism pledge
- Building upon the work done already -put on a similar kind of informative event or conference aimed at CYC, teachers & business owners – inviting speakers who do work on the ground, such as those

at Equal Inclusive Rights – to show what is actually meant by “anti-racism” in practice, and drawing on anti-racist and decolonial research and approaches.

- board memberships and working groups that are open to the public need to make a very conscious effort to include members of marginalised communities

Request that the Gypsy & Traveller community is fully considered in the anti-racism strategy.

Step 3 – Gaps in data and knowledge

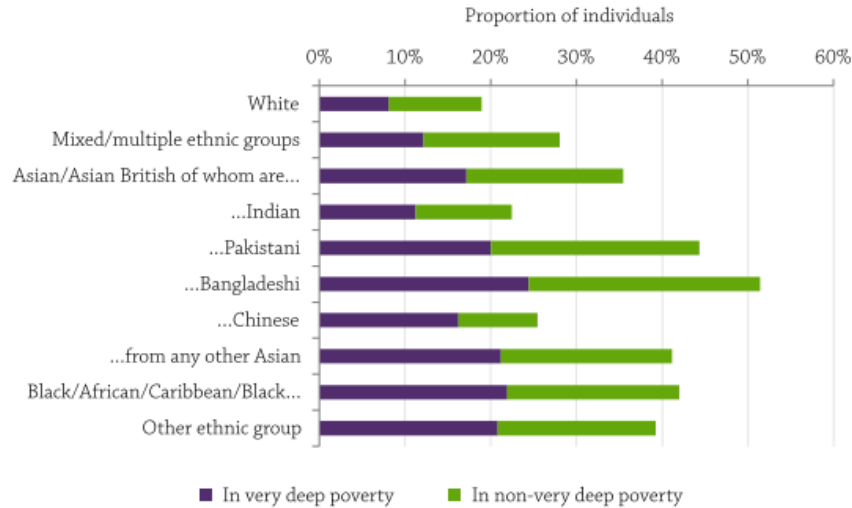
3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.	
Gaps in data or knowledge		Action to deal with this
Ongoing engagement with those with lived experience of racism to seek joint development of solutions.		Further development of BARMC staff forum and training of managers and other staff – build into CYC action plans. Ongoing engagement with IERUK and other minority group partners in the city.
Specific guidance on to how to handle and respond to racism in council policies		This will be addressed in Workforce race equality impact and work to identify gaps in meeting the Equalities Framework for Local Government
A mechanism for all institutions and partners in the city to take joint action in reducing racism and promoting active inclusion		Citywide partner groups such as refreshed Human Rights & Equality Board/Safer York Partnership– review membership to ensure all key organisations are included and joint action and responsibility is taken.

Step 4 – Analysing the impacts or effects.

4.1	<p>Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.</p>		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	Reducing hate crime, improving life chances and skills, career progression, reducing poverty and reducing health inequalities	+	H
Disability	As above – the findings of the independent report – reflected intersectional lived experience	+	H
Gender	As above – the findings of the independent report – reflected intersectional lived experience	+	H
Gender Reassignment	No specific actions around gender re-assignment but potential for work to be extended with this community through further intersectional , but approach does not have a negative impact in this area	+	L
Marriage and civil partnership	Greater awareness and respect for difference may bring a positive impact with regard to blended relationships	+	M
Pregnancy and maternity	No specific impacts although parents may feel safer bringing their children up in the city when hate/crime reduces and job prospects improve	+	L

Race	The focus of the report and recommendations – extremely high as the council and city responds positively	+	H
Religion and belief	Race and religion can be related and therefore a greater understanding and respect for difference, and reduced hate crime will have a positive impact. More understanding and supportive employers.	+	H
Sexual orientation	No specific actions around sexual orientation but potential for work to be extended with this community through further intersectional work, but approach does not have a negative impact in this area	+	M
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer	No specific impacts on carers depending on the cultural background and reliance on intergenerational support	+	L
Low income groups	<p>The Council's financial inclusion strategy contains the following key commitment:</p> <ul style="list-style-type: none"> ▶ inclusion for all. We will seek to eliminate the disproportionate impact of poverty on, for example, black & minority ethnic communities, disabled people, carers and older people. Equalities impacts will be tackled, and barriers removed by clear actions not words; <p>This will be entirely consistent with the actions to be developed through the CYC anti racism work to improve life opportunities.</p> <p>Joseph Rowntree Foundation Data:</p>	+	M

People in the Bangladeshi ethnic group have the highest overall poverty rate, followed by Pakistani and other Asian and Black ethnic groups, but very deep poverty rates vary less between different ethnic groups



Source: Households Below Average Income, 2020/21, DWP

Ethnic minority families are disproportionately affected by changes to the benefit systems. They are also more likely to be working in low-paying insecure work, so labour market trends are also critical. There are also differences in the typical family types for different ethnic groups, with the average family size for some ethnic minorities being higher than average. They will also have higher household costs because they are more likely to have children in their household.

Veterans, Armed Forces Community

No specific actions around armed forces communities but potential for work to be extended through partnership working on the city’s response to the anti racism strategy, but approach does not have a negative impact in this area

+

L

Other			
Impact on human rights:			
List any human rights impacted.	<p>The council has a duty to protect a person’s human rights and this report impacts positively on the following:</p> <ul style="list-style-type: none"> • Article 2: Right to life • Article 3: Freedom from torture and inhuman or degrading treatment • Article 4: Freedom from slavery and forced labour • Article 5: Right to liberty and security • Article 9: Freedom of thought, belief and religion • Article 14: Protection from discrimination in respect of these rights and freedoms <p>There is no need to balance equalities duties and Human Rights as all will be protected by the actions recommended in this report</p>		

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups

- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
<p>The original Strategy report highlights many areas of systematic and/or institutional racism - the local CYC action plan that has been developed from the independent report will seek to mitigate the findings from the data and the feedback from staff . It is important to put the staffing resources in place to support a change in process, systems and culture and reflect and revisit the agreed actions over time. It will be necessary to have ongoing feedback and involvement from the workforce staff group and community to hear the voice of lived experience to ensure the solutions involve them and address their needs and risks.</p>	

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
<p>- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</p>	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
No major change to the proposal	<p>The independent Anti-Racism report is already evidence based and the clear feedback from our staff group continues to justify the conclusions and recommendations in the report with a positive impact on all affected groups.</p> <p>It is important however to ensure that areas identified from this EIA are built into the action plan in the following areas so we have added the following actions:</p> <ul style="list-style-type: none"> • Ongoing engagement with those with lived experience of racism to seek joint development of solutions. • Specific guidance on to how to handle and respond to racism in council policies • A mechanism for all institutions and partners in the city to take joint action in reducing racism and promoting active inclusion.

Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.			
Impact/issue	Action to be taken	Person responsible	Timescale
Ensure ongoing engagement with those with lived experience of racism to seek joint development of solutions.	Further development of BARMC staff forum and training of managers and other staff – build into CYC action plans. Ongoing engagement with IERUK and other partners representing minority group in the city.	Head of HR & OD/AD for Customer, Communities & Inclusion CYC HREB Members	Ongoing
Provide specific guidance on to how to handle and respond to racism in council policies	This will be addressed in Workforce risk assessment referred to above and work to address gaps in meeting the Equalities Framework for Local Government. Customer policy is under development	Head of HR & OD/AD for Customer, Communities & Inclusion	September 2024
Create a mechanism for all institutions and partners in the city to take joint action in reducing	Citywide partner groups such as refreshed Human Rights & Equality Board/Safer York Partnership– review	Director/AD for Customer, Communities & Inclusion	Immediate.

racism and promoting active inclusion	membership to ensure all key organisations are included and joint action and responsibility is taken. To be involved in city wide initiatives and summits currently in discussion with community sector leads and IERUK 3.0 led task group membership to ensure all key organisations are included and joint action and responsibility is taken		
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Step 8 - Monitor, review and improve

8. 1	How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	The refreshed Human Rights & Equality Board may monitor progress if agreed, there will be reports to Executive member on progress and likely overview from scrutiny committees. Reports to Executive and Executive members will include updated EIAs.