

**City of York Council**  
**Equalities Impact Assessment**

**Who is submitting the proposal?**

<b>Directorate:</b>	Customer and Communities		
<b>Service Area:</b>	Equalities, Access & Inclusion		
<b>Name of the proposal :</b>	<b>Anti-Racism &amp; Inclusion Strategy and Action Plan</b>		
<b>Lead officer:</b>	Pauline Stuchfield		
<b>Date assessment completed:</b>	29 <sup>th</sup> June 2023		
<b>Names of those who contributed to the assessment :</b>			
<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
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

## Step 1 – Aims and intended outcomes

<b>1.1</b>	<b>What is the purpose of the proposal?</b> Please explain your proposal in Plain English avoiding acronyms and jargon.
	To present the city-wide strategy and action plan from the independent and cross-sectional working group led by Inclusive Equal Rights UK 3.0 (IERUK), and seeks approval of the council's response and next steps.
<b>1.2</b>	<b>Are there any external considerations?</b> (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.
<b>1.3</b>	<b>Who are the stakeholders and what are their interests?</b>
	All residents in the city 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. All York city partners who are named in the strategy. All employers/businesses and education /skills partners in relation to the items contained in the strategy

1.4	<p><b>What results/outcomes do we want to achieve and for whom?</b> 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 council is recommended to declare, pledge and provide city leadership on this issue and will work with all partners to do the same in declaring that this failure is unacceptable with a clear route to making the actions a reality.</p> <p>Importantly agree the council’s response to the strategy and action plan and next steps, including a clear commitment in the new Council Plan and a detailed plan of delivery within 3 months, and instruct officers to carry out the steps identified and ensure that a further report will be presented to Executive within three months in response to the strategy, with recommendations for change where actions can be implemented in the short term and also identifying medium and longer term measures,</p> <p>Demonstrating the council’s commitment to becoming an anti-racist and inclusive city is consistent with the emerging Council Plan around addressing all inequalities. The impact of structural inequalities and racism, however will have an impact on every element of the emerging Council Plan and associated policies.</p> <p>Whilst the work contained in this report was delivered by IERUK 3.0 the resulting council action plans clearly will contribute to the council’s ambitions around:</p> <ul style="list-style-type: none"> <li>a) <b>Health</b> – 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 .</li> <li>b) <b>Environment</b> – 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. .</li> </ul>

	<p>c) <b>Affordability</b> – systemic and institutional racism can impact on access to jobs, skills development and economic opportunity and so any improvements made in response to the report will have direct benefits of the financial and economic wellbeing of the community</p> <p>d) <b>Human Rights and Equalities</b> – this report focuses not only people of colour, those from ethnic minority backgrounds but also intersectional representation and multi complex needs.</p>
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## Step 2 – Gathering the information and feedback

<b>2.1</b>	<b>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?</b> 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.	
	<b>Source of data/supporting evidence</b>	<b>Reason for using</b>
	All the data is contained in the detailed report at Annex A	The actions in the strategy document are based on the data 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
	Results from IERUK’s engagement with the council’s leadership group in early June 2023.	Contained in the report at Annex A this feedback has been used to shape some of the actions in the report.
	Feedback from the council’s own Black & Minority Ethnic staff group <ul style="list-style-type: none"> <li>Majority of the group like working for York, people are friendly and some</li> </ul>	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

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 an anti racist city.

However there needs to be a real focus on

- Racism what does that mean and how micro and macro aggressions can affect people who are a minority
- 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.

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.

### Step 3 – Gaps in data and knowledge

3.1	<b>What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.</b>		
<b>Gaps in data or knowledge</b>		<b>Action to deal with this</b>	
Ongoing engagement with those with lived experience of racism to seek joint development of solutions.		Further development of 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 the detailed action plan to be developed and work to address 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.

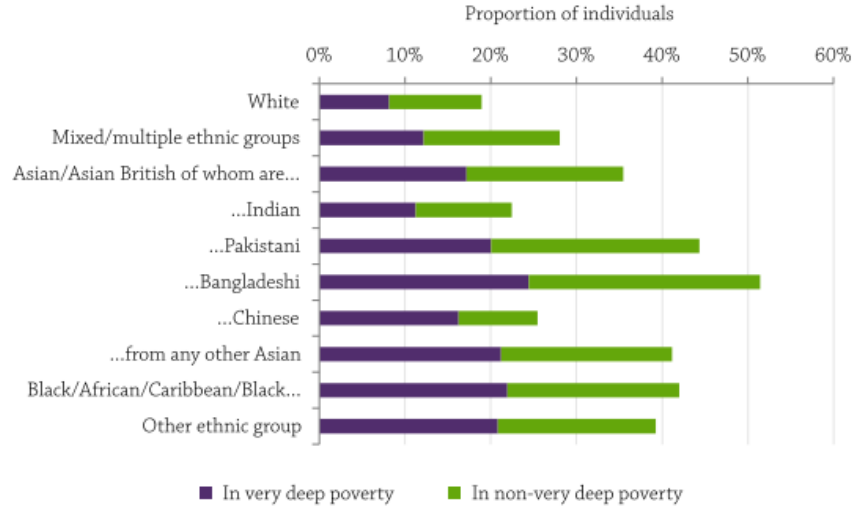
4.1	<b>Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments?</b> Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
<b>Equality Groups and Human Rights.</b>	<b>Key Findings/Impacts</b>	<b>Positive (+) Negative (-) Neutral (0)</b>	<b>High (H) Medium (M) Low (L)</b>

<b>Age</b>	Reducing hate crime, improving life chances and skills, career progression, reducing poverty and reducing health inequalities	+	<b>H</b>
<b>Disability</b>	As above – the findings of the independent report – reflected intersectional lived experience	+	<b>H</b>
<b>Gender</b>	As above – the findings of the independent report – reflected intersectional lived experience	+	<b>H</b>
<b>Gender Reassignment</b>	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	+	<b>L</b>
<b>Marriage and civil partnership</b>	Greater awareness and respect for difference may bring a positive impact with regard to blended relationships	+	<b>M</b>
<b>Pregnancy and maternity</b>	No specific impacts although parents may feel safer bringing their children up in the city when hate/crime reduces and job prospects improve	+	<b>L</b>
<b>Race</b>	The focus of the report and recommendations – extremely high is the council and city responds positively	+	<b>H</b>
<b>Religion and belief</b>	Race and religion can be related and therefore a greater understanding and respect for difference, and reduced hate crime will have a positive impact.	+	<b>H</b>
<b>Sexual orientation</b>	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	+	<b>M</b>

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"> <li>▶ <b>inclusion for all.</b> We will seek to eliminate the disproportionate impact of poverty on, for example, black &amp; minority ethnic communities, disabled people, carers and older people. Equalities impacts will be tackled, and barriers removed by clear actions not words;</li> </ul> <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**

<b>Other</b>			
<b>Impact on human rights:</b>			
List any human rights impacted.	<p><b>The council has a duty to protect a person’s human rights and this report impacts positively on the following:</b></p> <ul style="list-style-type: none"> <li>• Article 2: Right to life</li> <li><input type="checkbox"/> Article 3: Freedom from torture and inhuman or degrading treatment</li> <li><input type="checkbox"/> Article 4: Freedom from slavery and forced labour</li> <li><input type="checkbox"/> Article 5: Right to liberty and security</li> <li><input type="checkbox"/> Article 9: Freedom of thought, belief and religion</li> <li><input type="checkbox"/> Article 14: Protection from discrimination in respect of these rights and freedoms</li> </ul> <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><b>High impact</b> (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><b>Medium impact</b> (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><b>Low impact</b> (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	<b>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?</b>
<p>The report highlights many areas of systematic and/or institutional racism - the local plans that will be developed from the independent report will need to mitigate the findings from the data and the feedback from staff . It is important to report back quickly, put resource 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 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	<b>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:</b>
<p>- <b>No major change to the proposal</b> – 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.

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

## Step 7 – Summary of agreed actions resulting from the assessment

<b>7.1 What action, by whom, will be undertaken as a result of the impact assessment.</b>			
<b>Impact/issue</b>	<b>Action to be taken</b>	<b>Person responsible</b>	<b>Timescale</b>
Ongoing engagement with those with lived experience of racism to seek joint development of solutions.	Further development of 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	Build into Action Plan October 2023
Specific guidance on to how to handle and respond to racism in council policies	This will be addressed in the detailed action plan to be developed and work to address gaps in meeting the Equalities Framework for Local Government	Head of HR & OD/AD for Customer, Communities & Inclusion	Build into Action Plan October 2023 Review against EFLG March 2023
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	Director/AD for Customer, Communities & Inclusion	Start immediately after approval.

## Step 8 - Monitor, review and improve

<b>8. 1</b>	<b>How will the impact of your proposal be monitored and improved upon going forward?</b> 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.