

V020514

Name of project/ policy

insert

.....
Gaelic Language Plan 2013
.....

Date 15-07-14
.....

These notes are here to help – please read them carefully! Further assistance and guidance can sought from the Education and Inclusion officer or the Park For All Group, contact:

elspethgrant@cairngorms.co.uk

You can attach extra pages if there is not enough space on the form. Clearly mark on the extra sheets which question the extra information refers to.

*The specific duties for Scottish public authorities came into force in May 2012.

Equality Impact Assessment (EqIA)

Background

We have designed this assessment form to help our staff carry out equality impact assessments (EqIAs) on projects that they manage for us. Under equalities law, we have a legal duty to carry out EqIAs on all relevant aspects of our work.

What is an EqIA?

An EqIA is a process of analysing a proposed or existing project (such as a policy, a service, a facility, research, a management paper, building or access work, an event or a publication). The aim is to identify any discriminatory or negative effects or impacts the project could have on a particular group or sector of the community or workforce. These effects could be as a result of people's race, disability, gender, age, religion or beliefs, or sexuality (referred to throughout as 'equality groups' or 'protected characteristics'). The outcome of the EqIA is to make sure that we prevent or limit, as far as possible, any negative effects or barriers our projects have. We also use the EqIA to take full advantage of any opportunities for promoting equality.

NB Separate from EqIA, CNPA has a wider commitment to social inclusion and developing a Park for All, by positively supporting three groups namely people with disabilities, people on low incomes, and young people.

Why do we have to do them?

The Equality Act (2010) came into force in April 2010 and puts a general duty on public authorities to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. In addition the specific duties for Scottish public authorities* require that CNPA assesses the impact on equality groups of all proposed new or revised policy or practice against the needs of the general duty.

Assessing impact is an effective way of improving policy development and service delivery, making sure we consider the needs of employees and the communities we serve; identify potential steps to advance equality and foster good relations; and do not discriminate unlawfully.

What do I do now?

As part of the process of planning your project – in the same way that you would fill out an Expenditure Justification Form (for example) – you should carry out an initial screening to check whether the project is relevant to the equality groups. You should not start work on your project until you have filled in the Initial Screening form.

When do I need to do a full EqIA?

The Initial Screening form will tell you whether you need to complete a full EqIA, which will be the case if the project is likely to have a significant effect on one or more equality groups. You should begin the full EqIA in the early stages, although you are likely to finish it over the course of the project, depending on any research and consultation you need to do. All full EqIAs require to be published on our website.

INITIAL SCREENING

1 Name of the project and its main aims

[Gaelic Language Plan 2013](#) which aims to support the national plan for Gaelic to ensure that Gaelic has a sustainable future in Scotland and the Cairngorms National Park. The plan focuses on Gaelic Language signage, communications, publications and staff training.

2 Is this a new or existing project? Delete as relevant: **New**

3 Name of the completing officer with overall responsibility for carrying out the EqlA

Name: Francoise van Buuren
Position: Head of Communications & Engagement

4 Do you share responsibility for carrying out the project with other colleagues or organisations? Delete as relevant: **Yes**
If yes, please give details

Name:	Position:
Kate Christie	Head of Organisational Development
Donald Ross	Digital Communications Officer
Karen Archer/Charlotte Milburn	Press Officer (job share)
Alison Fleming	Communications Officer
Jacquie Barber	Visitor Services Officer
Penny Lawson	Land Management Officer

5 a) Does your project impact on people? (e.g. service users, businesses, employees, wider community) **Yes** (detail below, noting target audiences)

- Communities in the Park (3% of residents have some Gaelic ability)
- Tourism businesses & visitors (1.5 million visit the Park each year)
- CNPA staff & Board (40% have an interest in learning Gaelic)

b) Is it a major policy, significantly affecting how CNPA functions are delivered? **Yes**

c) Will it have a significant effect on how other organisations operate? **Yes**

d) Does it relate to functions that previous involvement activities have identified as being important to particular groups? **Yes**

e) Does it relate to an area where CNPA has set equality outcomes? **Yes** (If yes, please specify)

Outcome 1: By removing barriers, more equality groups, including young people, will enjoy, learn about and help to conserve and enhance the Park.

Outcome 3: People from equality groups will be aware of and able to access information about the Park, including its recreation opportunities.

Outcome 4: Communities, including young people and people with disabilities, will be able to easily engage with the planning process

Outcome 5: The CNPA will have a more diverse, inclusive and positive working environment for staff

f) Does it relate to an area where there are known inequalities? **Yes**

6 If you answered **Yes** to any of the above, please proceed to **Q7**. If you answered **No** to all of these, you do not need to carry out a full EqlA so proceed to question 12 to sign and complete the initial screening process.

Question 1

A project may be a policy, process, plan, strategy, or work area in the Operational Plan

Question 2

You should fill in the initial screening form for all new projects. For existing projects (e.g. website) you should develop a realistic schedule for completing the EqlAs over a set period of time.

Question 3 - 4

If the officer carrying out the EqlA is not necessarily the only person responsible for putting the project in place – if you share the project with other colleagues or partner organisations please give details. Be sure to confirm with partners who is taking responsibility for the EqlA.

Ideally, all members of the project team should collectively complete this EqlA form.

Question 5

a) For example, the public, contractors, hill walkers, naturalists, community groups, residents, young people, visitors, employees, or people applying for jobs

b) For example planning policies

c) For example grants programme, partnership project, Park Plan

d) For example outdoor access, methods of communication and engagement.

e) CNPA's equality outcomes will be published in April 2013. [Draft outcomes here.](#)

f) For example access to countryside, gender pay gap.

Question 7

a) You will need to consider all equality groups (protected characteristics). A fuller explanation of the characteristics can be found [here](#). Consider any evidence to suggest there are different needs or expectations, equal access to services and opportunities, patterns of representation, different experiences, or different levels of satisfaction. Consider informal sources of information as well as published or unpublished research. One of your first stops should be reference to [completed generic EqlAs](#) which may suggest possible impacts. You may also have consulted the [Inclusive Cairngorms](#) advisory forum. Other sources might include information from monitoring, visitor survey, consultation exercises, corporate guidelines / best practice from CNPA and other organisations or expert advice. You could also consider other public organisations and their EqlAs. The CNPA library contains published data also.

b) Using your evidence, consider the impacts carefully and detail whether it is a high, medium or low impact. You may also want to think about whether impacts are positive or negative. Refer to the [generic EqlAs](#) where appropriate.

Prioritising projects for high, medium or low impact:

High – the project affects significant numbers of people, and/or there is significant potential for adverse impact

Medium – the project affects some people and/or there is some evidence to suggest adverse impact.

Low – the project affects few people and/or there is little evidence to suggest adverse impact.

Example: CNPA website

- * Equality Strand – Disability
- * Impact – Visual Impairment will impact on someone’s ability to access the website giving them a negative experience
- * H, M or L – High impact as it is important to make all CNPA information both printed and electronic as accessible as possible

7 What evidence is already available to you to help you identify the impact that the project may have on the equality groups (e.g. what do you already know about the diversity of your target audience and their needs and/or experiences?).

a) Source of evidence:

Research data: local residents, businesses & visitors from 2001 census, Bòrd na Gàidhlig & Comunn na Gàidhlig, Land Management Training Programme
 CNPA Guidance: producing publications & printed materials, developing websites & web content, holding public events, engaging with communities
 Inclusive Cairngorms provide advice (e.g. online communications toolkit)

b) Impacts

Equality group	Impacts (positive, negative, no effect, not clear)	High, med, low
Age	Overall, the impact is considered to be low, some ‘hard to reach’ groups are more difficult to engage with (e.g. younger audiences) and the ability of some groups to become involved may mean the impact for older people is medium. <ul style="list-style-type: none"> • Older people with disabilities (visual/hearing/physical) may not be able to access information and venues. • Young people may not be able to participate due to lack of transport, cost Equalities will be considered as part of specific comms & engagement activities to minimise any impact and promote inclusion.	Low-medium
Disability	Overall, the impact is considered to be low. We provide printed materials in large print, our website has triple A rating, our event management standards cover inclusion aspects for less able people. Venues for some events may not be accessible for people with physical disabilities (particularly where it requires visiting a specific habitat) and information and publicity may not be accessible to people with learning disabilities.	Low
Gender / gender reassignment	Overall, the impact is considered to be low. We ensure there is a balance of images/messages that reflect the gender balance of the Park.	Low
Marriage and civil partnership	No known impacts	Low
Pregnancy and maternity	No known impacts	Low
Race	Overall, the impact is considered to be low. We ensure there is a balance of images/messages that reflect the race balance of the Park. We will raise awareness of Scotland’s cultural heritage and opportunities for people to use/learn Gaelic.	Low
Religion / belief	No known impacts	Low
Sexual orientation	No known impacts	Low

Question 8

Thinking about implementing the project, how is it likely to affect or help to:

a) eliminate discrimination, eg against disability, harassment, victimization, or less favourable treatment.

Example: in CNPA employment and recruitment activities

b) advance equality of opportunity eg by removing or minimizing disadvantage linked to gender, age, ability etc, or encouraging participation of under-represented groups.

Example: Ensuring accessibility of CNPA publications or meetings; providing staff with training and development opportunities

c) foster good relations eg by tackling prejudice and promoting understanding

Example: Provision / promoting equalities and diversity training to Park service providers; using relevant images in publications; gathering relevant equalities data in surveys, feedback forms, etc

List the good practice that you are already doing!

Question 9

Insert guidance on Human Rights!!

8 Considering the impacts identified in 7b, how will the project affect or help to eliminate discrimination, advance equality or foster good relations between groups of people?

	Project activity (stating which equality groups are likely to be affected)
a) Eliminate unlawful discrimination	
b) Advance equality of opportunity	We will target younger audiences to get involved with the Park using digital media & campaigns aimed at families. Support materials to help others promote the Park will use appropriate images reflecting the age, gender & race balance found in the Park. Public events and engagement will follow the EqlA good practice guidelines and Community Engagement Standards to ensure they are accessible to all. Activities will be designed to consider, and when appropriate promote access to age, gender, race and disability equality groups with support from Inclusive Cairngorms.
c) Foster good relations between groups of people	Gaelic Language training courses and events will encourage participation from different groups of people. Our activities will bring interest groups together to work in partnership particularly through our campaigns and events programme. Our digital communications will encourage online networking bringing groups of interest together to support each other, share information and ideas.

9 Could the project have implications for human rights? What would these be?

10 Considering your responses to Q7-9 will determine whether you need to do a full EqlA. A full EqlA is required if :

- you have no or little info which tells you whether the project is likely to affect equality groups
- you have identified a High impact in 7b but you are not confident that you understand how the project will affect the relevant equality group.

Do you plan to carry out a full EqlA? **No**

What information supports your decision?

Impacts have been identified as low-medium; identification of impacts has been informed by research and previous experience, EqlA good practice guidelines and external advice from specialist groups and suppliers e.g. Bòrd na Gàidhlig & Comunn na Gàidhlig, web designers.

11 Finally, is there any action that can be taken even if a full EqlA is not required?

Third parties delivering projects will be requested to take equalities into consideration as part of their terms and conditions of any CNPA funding.

Continue to refer to best practice guidelines for work relating to events, publications, websites and community engagement and gain input from Inclusive Cairngorms when required.

Work in partnership with other public sector bodies to share best practice in relation to the implementation of Gaelic Language Plans.

12 Screening Completion

To complete the initial screening, carry out a final check, and both you and your line manager should sign and date the form before passing to Catriona Campbell. A copy should be kept for your files.

Completing Officer:

Date:

Line Manager:

Date:

Please also email this document to

CatrionaCampbell@cairngorms.co.uk, and
Elsbethgrant@cairngorms.co.uk

Please email this initial screening document to CatrionaCampbell@cairngorms.co.uk and a copy should be retained for your own files. If you need to complete a full EqlA, please continue.

Under the Freedom of Information Act, we have a duty to release this initial screening document if we are asked to.

This document will also be available on the CNPA website.

Question 13

If you have identified that your project has a **high** impact, it is likely (particularly new projects), that you will not have all of information available and so you will need to carry out more research or consultation. If there is evidence already available, consider if the information is relevant, reliable and detailed enough. Would carrying out more research or consultation be justified, given the importance of the project? Is it likely to lead to a different outcome?

You will need to understand the views of the people who are likely to be affected or who have an interest in the project. You should consider how to reach those affected groups and make it easy for them to respond. Consider meetings as well as written consultation, taking into account people's needs (for example, access and transport for disabled people, childcare, arranging evenings so that they do not clash with religious festivals). You may need to consider hard-to-reach groups such as new migrants, gypsy travellers or people in isolated areas. You should also consider different methods of consulting and different formats for materials (for example, tapes, large print).

Make use of [Inclusive Cairngorms](#) to consult relevant groups. Contact the Education and Inclusion officer elspethgrant@cairngorms.co.uk

Question 14

The assessment should focus on agreeing how to reduce negative effects and increase positive effects by making changes to the project and how it is put in place. Any partners you have identified may have processes and policies which could help reduce the negative effects or promote opportunities. *Continued next page*

FULL EQUALITY IMPACT ASSESSMENT (EqIA)

Gathering additional information

I3 If your project has a **high impact** on any equality group, or you have identified a gap in evidence, you may need to carry out further research or consultation to ensure that the project/policy is effective and fully meets the needs of users. Please provide details below.

Evidence Gathering:

Consultation/involvement:

Assessing impact

I4 Has this further research/consultation highlighted any additional issues to those you had already identified? Please list below, any new impacts identified and state whether these are positive or negative and whether they are high, medium or low impacts. Explain briefly your thinking.

Equality group	Impact / issue Positive or negative? (P/N)	Is it high, medium or low impact?
Age; Disability; Gender; Gender reassignment; Marriage and civil partnership; Pregnancy and maternity; Race; Religion/Belief; Sexual Orientation (list as relevant)		

Question 14 continued

For example, although we fund some Ranger Services, it is mostly local authorities who employ rangers. Rangers have an opportunity to provide equal opportunities, promote positive attitudes and encourage good relations between people of different groups. As a result, it is important that rangers receive equality training which may be provided by local authorities.

Consider any negative effects and whether they could be justified. Perhaps there is conflict with your legal duties, our strategic aims or local commitments or needs. *For example, if the project involves volunteering but only for those over the age of 18, this has a negative effect on young people but can be justified under the Child Protection Act and health and safety regulations.*

Consider any positive effects and how you can take full advantage of them.

Question 15

See Question 8 guidance

Question 16

Once you have gathered the information, assessed the effects and got views through consultation, you can come to a conclusion about what you will do.

- a) **Apply the project** with no major change ie, the assessment shows the project is robust and has maximized the opportunity for equality
- b) **Adjust the project** to remove negative impacts or to advance equality
- c) **Continue the project** despite identifying adverse effects
- d) **Stop the project** where adverse effects cannot be justified / mitigated

15 Considering any new impacts or issues identified, **how will your project affect or help to:**

	Project activity (positive or negative)
a) Eliminate discrimination Eg against disability, harassment, victimization, less favourable treatment	
b) Advance equality of opportunity Eg remove/minimize disadvantage, meet the needs of different groups, increase participation of certain groups, take account of disabled people's impairments	
c) Affect good relations between groups Eg tackle prejudice, promote understanding	

16 Having considered the impacts, you have four options. Please tick:

- a) Apply the project with no major change
- b) Adjust the project go to Q17
- c) Continue the project
- d) Stop the project

If you answered a, c or d please provide reasons:

Action Planning

Question 17

Refer to the [Park for All checklists](#) for possible actions to consider.

You should identify who will take forward any actions, and set a target date for doing so. When considering other measures, consider whether any revisions you make are justified, given the importance of the project (in other words, in terms of their effects, cost and so on).

17 Based on impacts identified, what changes will you be making to the project as a result of going through the EqlA process?

Monitoring arrangements

Question 18

Monitoring is part of the process as it helps identify the actual effects of the project and any changes you make, and trends over a period of time.

18 Explain how you will monitor and evaluate this project, and if required, when this project will be reviewed?

Question 19

To complete the full EqlA, carry out a final check, then you and your line manager should sign and date the form. The form should then be emailed to Catriona Campbell. All full EqlAs will be logged and actions monitored by the Park for All group who meet quarterly.

19 Completion

Completing Officer:	Date:
Line Manager:	Date:

Please note that you have a duty to provide feedback – at an appropriate time during the project – to the people you consulted in the process of carrying out this EqlA.

Please email this full EqlA to CatrionaCampbell@cairngorms.co.uk and a copy should be retained for your own files.

We have a legal duty to publish the results of full EqlAs; these will be published on our website.