

Glasgow City Region City Deal

Equality Impact Assessments

Draft Report

Internal Audit

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Management System Certification

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1. Introduction

- 1.1 As part of the 2021/22 Internal Audit Plan, we have undertaken a review across the Glasgow City Region City Deal Programme Management Office (the PMO) and member authorities of the arrangements in place for undertaking equality impact assessments (EqIA) in relation to capital projects.
- 1.2 The Equality Act 2010 places a duty on public sector bodies to pay due regard to three needs when carrying out their functions, i.e. the need to eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct; the need to advance equality of opportunity between people who share a relevant protected characteristic and those who do not, and the need to foster good relations between people who share a protected characteristic and those who do not. The Assurance Framework states that the Accountable Body (i.e. GCC) will ensure its responsibilities under the Equality Act 2010 are regarded when apportioning the grant funding. In addition, as part of the objective of inclusive growth, the City Deal is also committed to achieving improved outcomes for equalities groups with protected characteristics¹.
- 1.3 Further to this, the Programme Management Toolkit states that the development of City Deal project business cases by member authorities should include the completion of an EqIA if required to identify risks and mitigations associated with the project in terms of impact on protected characteristics groups. This should be refreshed during the final business case.

¹ i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Risks, and mitigations against these, should be recorded in programme and project risk registers if required. Additionally the toolkit expects that within project evaluation plans, where appropriate, consideration should be given to how project officers will monitor the benefits that are delivered in relation to specific equalities groups, which may vary depending upon the nature of the intervention and the particular benefits (e.g. transport, housing, public realm, employment etc). This should be monitored against the content of the Equality Impact Assessments.

- 1.3 The purpose of the audit was to ensure that the PMO and member authorities comply with the Equalities Act, Assurance Framework and Project Management Toolkit requirements to undertake EqIAs during the development of project business cases. The scope of the audit included a review of:
- Documented policies, procedures and templates relating to EqIAs;
 - Roles and responsibilities of key officers and teams;
 - Awareness of requirements among the PMO and member authorities;
 - A sample of EqIAs undertaken for projects, and associated supporting documentation;
 - Arrangements for addressing risks to equalities groups identified through EqIAs;
 - The appraisal of EqIAs within business cases by the PMO;
 - Arrangements for monitoring and evaluating benefits identified through the EqIA process, and
 - Record keeping arrangements.

2. Audit Opinion

- 2.1 Based on the audit work carried out, assurance can be taken that the control environment is satisfactory.

3. Main Findings

- 3.1 We are pleased to report that key controls are in place and operating effectively. All member authorities have corporate policies, procedures and templates in place relating to EqlA. We were satisfied that these cover all parts of process and are accessible to all relevant officers.
- 3.2 City Deal officers are aware of their roles and responsibilities in the EqlA process, with officers having access to EqlA training and guidance to support them in their role. All member authorities have adequate record management arrangements in respect of EqlA assessments and supporting documentation.
- 3.3 Additionally, we found through sample testing of seven City Deal projects and supporting Business Cases (BC), that in all instances, EqlA was considered and where appropriate (five cases) an EqlA assessment was conducted in line with the member authorities procedures. For those where an EqlA assessment was required, we observed that these had been recorded in the Full Business Case (FBC). We also observed that in all instances the FBC's had been subject to PMO appraisal to confirm that EqlA had been considered.
- 3.4 Lastly, we noted that the PMO is responsible for ensuring that member authorities are aware of EqlA requirements. For each stage of the BC, the member authority has to provide a

statement or an attachment to the BC to show they are applying the relevant principles and address any potential risks in the risk register. The PMO encourages member authorities to report any potential issues in the Interim and Quarterly Progress Reports.

- 3.5 The audit has been undertaken in accordance with the Public Sector Internal Audit Standards.
- 3.6 We would like to thank officers involved in this audit for their cooperation and assistance.

