Policy Response

Equality Impact Assessments for the 2014-2020 Structural Funds Programmes in Wales

A response from WCVA

16 May 2013

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A response to the Welsh Government’s consultation
Equality Impact Assessments for the 2014-2020
Structural Funds Programmes in Wales

1. Introduction to WCVA

Wales Council for Voluntary Action (WCVA) represents, campaigns for, supports and develops voluntary organisations, community action and volunteering in Wales. It represents the sector at UK and national level; and together with a range of national specialist agencies, County Voluntary Councils, Volunteer Centres and other development agencies, it provides a support structure for the third sector in Wales. It has over 3,000 members, and is in touch with many more organisations through a wide range of national and local networks. WCVA’s mission is to provide excellent support, leadership and an influential voice for the third sector and volunteering in Wales.

This response has been drafted by WCVA in consultation with the:

- Third Sector Partnership Council (TSPC);
- Third sector Equalities and Human Rights Coalition (EHRCo);
- Third Sector Anti-Poverty Programmes Taskforce (TSAPPT); and
- Third sector European forum (3-SEF)

WCVA welcomes the opportunity to respond to the Equality Impact Assessment (EIA) on the implementation of the Structural Funds 2014-2020 and believes that the research undertaken for the consultation document constitutes a sound evidence base for actions to be undertaken in the next round of programmes to positive impacts on different quality groups.

2. Summary of recommendations

WCVA recommends that:

i. WEFO considers the potential for inter-generational projects for further analysis.

ii. Project sponsors should use this evidence base by project sponsors to inform the setting of project objectives and the specific actions that will be taken to ensure that the delivery to people with protected characteristics is maximised.

iii. Project sponsors should actively engage with organisations that represent people with protected characteristics to design and deliver targeted interventions in the most appropriate way, and WEFO’s CCT team should play a key role in facilitating these interactions.

iv. WEFO’s CCT team should continue to proactively work with key stakeholders to commission targeted interventions, as identified in this report, where there are evident gaps in programme delivery.

v. WEFO should commission specific targeted interventions should be undertaken to deliver services in the most appropriate way to target groups, working with specialist
organisations that have a track record in understanding and meeting the needs of these client groups.

vi. Any ERDF investment in digital inclusion must work in close co-ordination with the ESF Priorities for Employment and Skills to support participants through the process of welfare reform.

vii. Self employment should be promoted as a progression route for ESF participants, underpinned by clear sign posting and hand holding to complementary business support services that are available through ERDF projects.

viii. WEFO’s CCT team should play a greater role in actively disseminating good practice examples and practical tools amongst project sponsors. This could be done by establishing a network of CCT champions amongst project sponsors as key stakeholders for this work; a seminar to show case good practice, or web based dissemination.

ix. WCVA welcomes the inclusion of tackling poverty and social exclusion as a third CCT but believes that equality on the grounds of protected characteristics should be integrated to take a whole system approach to tackling poverty, equality and socio-economic issues. If the links between poverty and protected characteristics were emphasised in the Operational Programmes, this could be a strong lever for change.

x. The approach to the new CCT of tackling poverty and social exclusion must be strengthened in order to bring practice and implementation in line with the high standards already in place for equality of opportunity and environmental sustainability. To achieve this, WCVA recommends that the WEFO should take the following actions:

- Work in close collaboration with the Welsh Government’s Tackling Poverty Expert Advisory Group and the Third Sector Anti Poverty Taskforce to undertake an equivalent poverty impact assessment for the new Programmes and projects (‘poverty proofing’);
- Include a representative from the Tackling Poverty Expert Advisory Group and the Third Sector Anti Poverty Programmes Taskforce on the Programme Monitoring Committee (PMC) for 2014-2020;
- Establish clear criteria for implementing the CCT for tackling poverty and social exclusion;
- Reinforce the commitment to tackling poverty and social exclusion by including visible priorities and financial allocations, ring-fencing 20% of ESF in line with the recommendation of the Europe 2020 Flagship Initiative and 5% of ERDF for a community led local development (CLLD) approach to facilitate direct interventions to tackle poverty in deprived communities;
- Establish a set of indicators for the Structural Funds Programmes which align as far as possible with the Welsh Government’s Tackling Poverty Action Plan, whilst allowing for flexibility and specificity as relevant to defined project activities and their anticipated antipoverty impact;
- Recruit a specialist in poverty and social inclusion to be a champion within the CCT team and provide expert advice to project sponsors.

xi. WEFO should undertake an equality impact assessment on access to Structural Funds for different sized organisations in Wales, to ensure that no organisation is unfairly disadvantaged by the application process and criteria for funding.
3. Responses to the consultation questions

1. Does the report include all the relevant evidence to allow us to assess whether the implementation of the Programmes will have an adverse effect or positive impact on people of different age, disability, gender, marriage and civil partnership, pregnancy and maternity, race and ethnicity, religion or belief, sexual orientation and transgender groups?

WCVA welcomes the detailed analysis of the different equality strands and is not aware of any additional evidence.

WCVA believes that the document does not sufficiently recognise the potential added value of inter-generational projects and this should be considered as an area for further analysis.

2. Do you have suggestions for improving access to the Programmes for eligible people of different age, disability, gender, marriage and civil partnership, pregnancy and maternity, race and ethnicity, religion or belief, sexual orientation, and transgender groups?

General comments

WCVA welcomes the report and believes that it presents a comprehensive evidence base that identifies specific opportunities for steering the delivery of Programme priorities to ensure that the impacts on people with protected characteristics may be maximised.

This evidence base should be used by project sponsors, working with their WEFO Project Development Officer (PDO) and experts from the Cross Cutting Themes (CCT) team, to inform the setting of project objectives and the specific actions that will be taken in delivering the project to ensure that the needs of people with protected characteristics are addressed.

Project sponsors should actively engage with organisations that represent people with protected characteristics during project development and throughout implementation to design and deliver targeted interventions in the most appropriate way, and WEFO’s CCT team should play a key role in facilitating these interactions.

Following WEFO’s active role in commissioning the WAVE project in the 2007-2013 Programmes, WCVA endorses a continued role for WEFO to proactively work with key stakeholders to commission targeted interventions, as identified in this report, where there are evident gaps in programme delivery. Any commissioning framework must involve relevant stakeholders in a process of co-production, with transparent processes which clearly demarcate when the design phase concludes (i.e. the point up to which stakeholders may be involved in designing a project) and the procurement process begins.

ERDF specific comments

The evidence establishes a clear need for specialist business support and access to finance for young people, older people, disabled people, BAME people, women and Welsh speakers. WCVA recommends that specific targeted interventions are undertaken to deliver services in the most appropriate way to these target groups, and
specialist organisations that have a track record in understanding and meeting the needs of these client groups should be commissioned to deliver this important work.

Digital inclusion initiatives may also play a critical role in supporting people through the process of welfare reform and transition to online benefits claims, and any ERDF investment in this area must work in close co-ordination with the ESF Priorities for Employment and Skills.

**ESF specific comments**

The evidence documents the preference of people with certain protected characteristics to set up their own businesses, therefore self employment should be promoted and supported as a progression route for ESF participants with clear sign posting and hand holding to complementary business support services available through ERDF projects.

3. **We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:**

WCVA recognises the important role of WEFO's CCT team in supporting project sponsors to enhance their implementation of these important foundation elements of the Structural Funds Programmes in Wales. WCVA recommends a greater role for the CCT team in actively disseminating good practice examples and practical tools, such as the CCT ‘Apps’ pioneered through the Communities 2.0 project. This could be done by establishing a network of CCT champions amongst project sponsors as key stakeholders for this work; a seminar to show case good practice, or web based dissemination. CCT champions could work collaboratively with the Tackling Poverty Champions in Welsh Government Departments, the network of Local Authority Tackling Poverty Champions and ideally with a network of Third Sector Tackling Poverty Champions financed through European Programmes 2014-2020 along the lines recommended by the Third Sector Anti-Poverty Programmes Taskforce in its response to the Structural Funds and RDP 2014 -2020 consultations.

**Tackling poverty and social exclusion as a cross cutting theme**

WEFO and the Welsh Government have introduced a third CCT of tackling poverty and social exclusion for the 2014-2020 Programmes. The links between poverty and equality on the grounds of protected characteristics are clear and well-evidenced. Geography and socio economic circumstances are often seen as the key aspects of tackling poverty, but WCVA believes that equality on the grounds of protected characteristics should be integrated to take a whole system approach to tackling poverty, equality and socio-economic issues. If the links between poverty and protected characteristics were emphasised in the Operational Programmes, this could be a strong lever for change.

WCVA welcomes the inclusion of tackling poverty and social exclusion as a CCT but believes that the approach must be strengthened in order to bring practice and implementation in line with the high standards already in place for equality of opportunity and environmental sustainability.

To achieve this, WCVA recommends that the WEFO should take the following actions:

- Work in close collaboration with the Welsh Government’s Tackling Poverty Expert Advisory Group and the Third Sector Anti Poverty Taskforce to undertake an equivalent poverty impact assessment for the new Programmes and projects
(‘poverty proofing’) to provide a baseline of evidence and highlight specific ways in which to maximise the impact of project delivery;

- Include a representative from the Tackling Poverty Expert Advisory Group and the Third Sector Anti Poverty Programmes Taskforce on the Programme Monitoring Committee (PMC) for 2014-2020;
- Establish clear criteria for implementing the CCT for tackling poverty and social exclusion;
- Reinforce the commitment to tackling poverty and social exclusion by including a visible financial allocation, ring-fencing 20% of ESF in line with the recommendation of the Europe 2020 Flagship Initiative and 5% of ERDF for a community led local development (CLLD) approach to facilitate direct interventions to tackle poverty in deprived communities;
- Establish a set of indicators for the Structural Funds Programmes which align as far as possible with the Welsh Government’s Tackling Poverty Action Plan;
- Recruit a specialist in poverty and social inclusion to be a champion within the CCT team and provide expert advice to project sponsors.

WCVA also recommends that WEFO should undertake an equality impact assessment on access to Structural Funds for different sized organisations in Wales, to ensure that no organisation is unfairly disadvantaged by the application process and criteria for funding. Organisations seeking to benefit from European funding in Wales, regardless of their size, should also be made aware of the high standards of practice expected by the Welsh European Funding Office (WEFO) in terms of transparency, accountability and probity.

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