



Equality, Fairness and Rights Impact Assessment (EFRIA)

The Equality, Fairness and Rights Impact Assessment (EFRIA) is one of our specific duties to [assess the impact](#) of applying a new or revised policy or practice against the needs of the General Equality Duty. This means East Renfrewshire Council must be mindful when assessing impact against these needs to:

- ensure the policy does not discriminate unlawfully
- consider how the policy might better advance equality of opportunity
- consider whether the policy will affect good relations between different groups

The Fairer Scotland Duty places a legal responsibility on particular public bodies in Scotland to actively consider ('pay due regard' to) how they can reduce inequalities of outcome caused by socioeconomic disadvantage, when making strategic decisions. The UN Convention of the Rights of the Child (UNCRC) is an international human rights treaty which sets out the rights every child has and has been incorporated into Scottish Law as the [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024](#).

The Equality, Fairness and Rights Impact assessment considers how a policy* could impact on the needs of individuals protected by the [Public Sector Equality Duty](#), [the Fairer Scotland Duty](#) and the [UN Convention of the Rights of the Child](#).

Please consult the [EFRIA guidance flowchart](#) to help you complete this assessment.

| | |
|------------------------------------|---|
| Name of policy*: | Charging for Services – School Meal price increase |
| Description of policy: | This proposal would see an increase of 10p in the cost of chargeable meals in early years and school lunches in primary and secondary schools from August 2025. |
| Why is the policy required? | To increase level of cost recovery in line with agreed corporate principles. |
| Date EFIRA completed: | 15 November 2024 |
| Completed by: | M Docherty |
| Lead officer for policy: | M Docherty/J McCaig |
| Department: | Education |

*The term 'policy' covers any work or function of East Renfrewshire Council i.e. customer and service delivery, staffing, criteria, practices, proposals, activities and decision-making

Guidance – please read

Section 1

This section enables you to determine if a full assessment is required. If a full assessment is not required, this must be clearly stated in **Section 9** of the form.

Section **2-8** is the full assessment covering the sections listed below:

| | |
|----------|--|
| 2 | Engagement and Consultation Give details of how different groups have been consulted about the policy. |
| 3 | Impact on individuals or groups with protected characteristics How will the policy impact individuals or groups who fall under one of the nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation? |
| 4 | Impact on socio-economic disadvantage How will the policy impact individuals or groups disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications? |
| 5 | Impact on Children and Young People How will the policy impact on the rights and needs of children and young people? |
| 6 | Contractors and suppliers Will the policy be delivered by any contractors or suppliers in full or partially? |
| 7 | Outcome of assessment and action plan What is your decision based on the assessment and are there any mitigations or actions that need to be addressed? |

| | |
|----------|---|
| 8 | Approval Details of when and who approved the policy. |
|----------|---|

Section 9 should only be completed where the screening shows no assessment is required

When completing the assessment you must consider relevant evidence, including information received from equality groups. This evidence should inform the result of your impact assessment. You're required to take action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and enhancing any potential for positive impact. If any adverse impact could result in unlawful discrimination, the policy must be fully reviewed and amended.

All impact assessments will be published on the Council website

1. Screening

This section should be completed to establish if a full assessment is required.

| | |
|--|---|
| 1.1 What is the nature of the work or activity? | |
| Select a category from below that explains the work or activity you are doing. | |
| <input type="checkbox"/> Policy or Strategy <input type="checkbox"/> Programme or Plan <input type="checkbox"/> Project delivery <input type="checkbox"/> Service or Function <input checked="" type="checkbox"/> Budget Proposal (Charging for Services) <input type="checkbox"/> Other please state: | Is this work or activity... <input type="checkbox"/> New <input checked="" type="checkbox"/> Change or review of existing <input type="checkbox"/> Other- Please state: Click or tap here to enter text. |
| 1.2 What will happen as a result of this policy? | |
| What changes will come about for individuals and groups through this policy?- Select all that apply | |

Change to Council, Trust or HSCP charging arrangements (including introduction, removal, increase or decrease)

Change to how a service is delivered (including addition, change or removal of practices/procedures/processes)

Change to provision of services or staffing

Change to entitlement or eligibility for service delivery or welfare/benefit access

Other. Please state: [Click or tap here to enter text.](#)

1.3 What groups of individuals are likely to be impacted by this policy?

Select which groups of individuals are likely to be impacted positively or negatively if this policy is implemented.

The policy has potential to impact individuals with protected characteristics*

The policy has potential to impact socioeconomic disadvantage for individuals**

The policy has potential to impact children and young people up to the age of 18

The policy has no impact on those specified above.

***Protected Characteristics** are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

****Socio-economic disadvantage** is where an individual is disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications

1.4 Is there any potential indication or evidence that the policy will discriminate unlawfully; affect equality of opportunity for different groups or affect good relations between different groups?

Will any individuals be treated less fairly than others if this policy is implemented? This includes employees, residents, community groups and visitors to the area.

Yes

No

Don't Know

Review your answers above.

- If the policy has **no impact on individuals**, and you have selected 'no' to section 1.3, an impact assessment is not required. **GO TO SECTION 9**
- If the policy will have an impact on individuals and/or you have selected 'yes or don't know' to section 1.3, complete the full assessment. **GO TO SECTION 2**

2. Engagement and Consultation

This section will assess how the policy is being communicated to certain groups and how you have consulted them.

2.1 How have individuals (incl. children & young people) who might be affected by the policy been consulted or involved?

This can include a summary of findings from recent consultations, surveys, user research or customer testing that has been carried out. Include dates and information.

In terms of the wider school meals service, pupils, parents and head teachers are consulted on an annual basis via a digital survey. Regular consultation also takes place via pupil councils and the Director of Education forums. Consultation, including food sampling with key stakeholders helps shape the service for the following year and deliver a pupil focused service. From recent surveys, 78% of PS parents believe that free school meals improves quality of life and 8% think meals are low cost. 54% of secondary pupils think school meals are value for money.

Consultation also undertaken as part of wider 3 year budget engagement in November 2022 - staff, parents and pupils

2.2 How will you communicate information about this policy to individuals who have: hearing and/or sight loss; English as an additional language; are digitally excluded; have literacy/numeracy barriers?

Think about how you will communicate information about the policy to the above individuals. This may include printed materials being accessible in other formats, e.g. Braille, easy to read, translated in other languages. More information can be found [here](#).

Were it to be approved, the change in the policy would be communicated both online through the Council's existing channels via the Council's wider communications on the budget setting process and changes to charging for services, but also through individual establishments in their ongoing communication with families. Where appropriate, individual establishments can tailor their approaches to communication, reflecting the needs of the families they work with. This may include bespoke arrangements for those with English as an additional language, hearing/sight loss or those with literacy or digital barriers. Furthermore, versions of wider Council communications in other languages is available on request.

3. Impact on groups with protected characteristics

This section will assess if the policy has potential to impact individuals with protected characteristics. You should consider any evidence or information you have on how it will affect different groups of individuals, both positively and negatively.

Below is a suggested list of sources:

- Input from local Councillors
- Findings from engagement exercise and consultations.
- Information or feedback from groups of individuals, such as equality interest organisations or groups who speak on behalf of others
- National, regional or local statistics
- Analysis of enquiries or complaints from customers
- Recommendations from inspections or audits
- National or regional research to identify similar issues
- Comparisons with similar policies in other departments or authorities to identify similar issues

You may want to consider collecting new evidence that you don't have but think will be relevant. For example: setting up meetings or focus groups, carrying out user research.

Please find other sources of evidence on page 9 of the [EFRIA guidance flowchart](#).

3.1 Use the table below to consider how the policy may impact on a particular group with protected characteristics through reviewing the evidence, experience and needs of this group

| Characteristics/circumstances | Evidence, experience and needs- outline any data or research that shows how this group may be impacted (include sources) | Will the impact on this group be positive, neutral or negative and why? |
|--|---|--|
| Age | <p>Children accessing the statutory entitlement to 1,140 of early learning and childcare are provided with free meals/snacks throughout the day. This policy only applies where parents/carers choose to access additional paid ELC provision and meals.</p> <p>Pupils within primary stages P1 to P5 benefit from universal free school meals. As well as the option to apply for a means tested free school meal, pupils within P6 and P7 who are eligible for Scottish Child Payment can also now access a free school meal where parents/carers provide evidence of this eligibility. This proposal would therefore impact on the remaining P6 and P7 pupils and secondary pupils who are not eligible for a means tested free school meal.</p> | <p>Negative for those age groups not eligible for a universal free school meal and those families who do not qualify for a free school meal due to household income.</p> |
| Disability or long term health condition | | |

| | | |
|---|-----|--|
| Race | | |
| Sex | | |
| Gender reassignment | | |
| Marriage/Civil Partnership (only applicable to Council employment policy) | | |
| Pregnancy / Maternity | | |
| Religion / Belief | | |
| Sexual orientation | | |
| Providing unpaid care | | |
| Any other relevant groups e.g. unemployed people, people experiencing homelessness, care leavers, people involved in the criminal justice system, people with literacy/numeracy barriers, people living in rural communities. | N/A | |

3.2 Are there known inequalities within the policy?

For example: barriers to transport for some groups; opening hours and location, organisational pay, terms or conditions; how public information is provided?

N/A

3.3 In what ways, if any, would this policy contribute to discrimination or help to eliminate it?

Discrimination means treating individuals differently from others. For example, not recruiting someone as they are deemed too old/young; or a support group running on an upper floor with no lift access will discriminate against people with mobility issues or wheelchair users

N/A

3.4 In what ways, if any, would this policy advance or undermine equality of opportunity?

This is when individuals from different backgrounds are treated fairly through providing an equal footing or level playfield to achieve outcomes. For example, children who have additional support needs are provided with teaching support to fully participate in the school curriculum or a deaf BSL user is provided with a BSL interpreter at health appointments.

The policy may increase health and wellbeing inequality from socioeconomic disadvantage and could increase educational disadvantage as a result of children being less ready to learn.

3.5 In what ways, if any, would this policy foster or undermine good relations between groups of individuals?

Consider aspects that may tackle prejudice or promote understanding between different groups. For example, ensuring new arrivals and refugees are given supports to integrate within local communities or an LGBTQI+ youth group provide training on LGBTQI+ experiences to a local faith group

N/A

4. Impact on socio-economic disadvantage

This section will assess how the policy may impact socio-economic disadvantage for individuals.

Socio-economic disadvantage is where an individual is disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications. Socio-economic disadvantage can be experienced in both geographical communities and communities of interest i.e. a group that share a common characteristic or circumstance. In East Renfrewshire there are a number of communities, known as locality planning areas, where people are at greater risk of experiencing socio-economic disadvantage including,

- Barrhead – Dunterlie, East Arthurlie and Dovecothall
- Auchenback
- Neilston
- Thornliebank

Consider the policy itself and the way it will be implemented. How will this deliver different experiences for individuals in East Renfrewshire?

4.1 In the section below consider how the policy may impact socio-economic disadvantage through reviewing the evidence, experience and needs of this group

| Characteristics/circumstances | Evidence, experience and needs- outline any data or research that shows how this group may be impacted (include sources) | Will the impact on this group be positive, neutral or negative and why? |
|-------------------------------|--|---|
| Socio-economic | Despite availability of Free School Meals, many families experiencing poverty do not receive free meals (inflation eroding income threshold; hidden poverty; procedural challenges around registration). | Negative Price increase is likely to negatively impact wellbeing of this group. |

4.2 Consider the impact outline in section 4.1, In what way would the policy alleviate or increase inequalities in socio-economic disadvantage?

Consider common inequalities such as poorer skills and attainment; lower paid and less secure work; greater chance of being a victim of crime; less chance of being treated with dignity and respect; lower healthy life expectancy; lower feeling of control over decisions that affect you.

The policy may increase health and wellbeing inequality from socioeconomic disadvantage and could increase educational disadvantage as a result of children being less ready to learn.

4.3 What opportunities are there within this policy and the way it will be implemented to promote inclusion, participation, dignity and empowerment of people experiencing socio-economic disadvantage?

For example, a new health centre is being built and considers affordability of public transport options for residents.

N/a

4.4 Is there anything in particular that will be done to address the multiple inequalities experienced by some people in Auchenback, Barrhead, Neilston and Thornliebank?

Continue to promote MART services and use of funds such as PEF to reduce the cost of the school day. Where appropriate schools are able to seek discretionary free school meals for particular pupils. Head Teachers within these communities will also be considering the longer term sustainability of the breakfast cart service.

5. Impact on Children and Young People

This section must be completed if any potential impact on children and young individuals up to the age of 18 have been identified in sections 1-4.

United Nations Convention on the Rights of the Child (Scotland) Act 2024 places a legal duty on public authorities to respect and protect children's rights in the work they do.

There are a range of elements that the Council must consider in supporting these rights including:

- Ensuring that children and young people have a voice in decisions that affect them – both directly and indirectly;
- Undertaking assessments of how well the Council is protecting children, including children's rights and wellbeing impact assessments and considering how budget planning supports better outcomes for children and young people

5.1 Are there known impacts on children and young people within the subject matter of the policy?

For example, changes to out-of-school services, employment support for parents, play parks.

As the primary beneficiaries of the service, children may be impacted by the proposal should it impact on a parent/carers' decision to pay for the service.

If there is no impact on children and young people GO TO SECTION 6

5.2 In the section below outline the UN Convention on the Rights of the Child (UNCRC) General principle that is relevant, the particular groups of children that will be affected and how this will impact them

Which [General Principles of UNCRC](#) are relevant to this policy/measure?

Tick all that apply

Which particular groups of children and young people are affected by this policy?

(e.g. young children, children with disabilities, children living in poverty, children in care, young people who offend).

Article 2

Non-discrimination

Children should not be discriminated against in the enjoyment of their rights. No child should be discriminated against because of the situation or status of their parent/carer(s).

| | | |
|---|--------------------------|---|
| <p>Article 3 Best interests of the child Every decision and action taken relating to a child must be in their best interests. Governments must take all appropriate legislative and administrative measures to ensure that children have the protection and care necessary for their wellbeing - and that the institutions, services and facilities responsible for their care and protection conform with established standards.</p> | <input type="checkbox"/> | |
| <p>Article 6 Life, survival and development Every child has a right to life and to develop to their full potential.</p> | X | Children living with poverty |
| <p>Article 12 Respect for the views of the child Every child has a right to express their views and have them given due weight in accordance with their age and maturity. This includes involving children in budget decisions that affect them. Children should be provided with the opportunity to be heard, either directly or through a representative or appropriate body.</p> | X | Pupils are consulted on the school meal service, including the cost of meals. |
| <p>Which additional articles are relevant to this policy/measure? List all that apply</p> | | |

In relation to the articles identified above, explain how the impact will be positive, negative or neutral.

| Relevant identified Article of UNCRC | Impact category (Positive/Negative/Neutral) | Assessment of impact (including consideration of whether the policy might impact different groups of children and young people in any other way). |
|--------------------------------------|--|--|
| Article 6 | Negative | An increase in meal prices is likely to negatively affect the health and wellbeing of some children. |
| | | |
| | | |

5.3 What opportunities are there within this policy to advance or undermine the rights of children and young people?

Explain how the policy can strengthen or weaken the rights of children and young individuals

The policy may result in children experiencing poverty being less ready to learn and as such it has the potential to undermine equality of opportunity.

5.4 What opportunities are there within this policy to protect and promote the wellbeing of children and young people?

For example promoting physical activity and healthy eating.

N/a

6. Contractors and suppliers

6.1 Will the policy be carried out by contractors or suppliers?

This includes fully or partially. If yes, how will you incorporate equality expectations into the contract?

No

7. Outcome of assessment and action plan

You have completed sections 1-6 above and assessed the impact of the policy on individuals with protected characteristics, those experiencing socio-economic disadvantage and children and young people. The following section outlines your decision based on this assessment, mitigations and actions that can be taken to reduce any negative impacts.

7.1 Having assessed the impact of the policy under sections 3,4 and 5 select the most appropriate outcome

Which option below best describes your next steps?

- Continue the policy as is
- Adjust the policy
- Stop the policy

7.2 Are there any significant and relevant information gaps that have not been filled during the development of this policy and how do you plan to address these during the life of the policy?

No

7.3 Briefly summarise how your evidence and assessment demonstrates any potential impacts, both positive and negative, on groups with protected characteristics from this policy?

This increase is likely to have an overall negative effect on the health, wellbeing and readiness to learn of children from families who are living with poverty but are not eligible for free meals.

7.4 Briefly summarise how your evidence and assessment demonstrates any potential impact, both positive and negative, on individuals and communities experiencing socio-economic disadvantage from this policy?

This increase is likely to have an overall negative effect on the health, wellbeing and readiness to learn of children from families who are living with poverty but are not eligible for free meals.

7.5 Briefly summarise how your evidence and assessment demonstrates any potential impacts, both positive and negative, on the rights of children and young people from this policy?

The policy is relevant to Article 6 and could negatively impact children's development over the longer term.

7.6 How long will this policy be in place and when is it scheduled for review?

Is this a temporary or permanent change and are there plans to review the policy?

The proposal is permanent. It will be reviewed on an annual basis as part of the Council's charging for services exercise.

7.7 Based on the findings from this impact assessment, outline any mitigating actions that will reduce the impact caused by the policy on individuals, including children and young people. The actions should also outline the communication and implementation of the policy.

| Identified adverse impact | Mitigating actions | Timeline | Responsible person |
|---|--|---|------------------------|
| Increase in cost leading to children living with poverty eating less, or less well. | Ensure all schools are aware of the procedures for Discretionary Free School Meals. | Ongoing | J McCaig |
| | Promotion of eligibility for free school meals to P6 and P7 children in receipt of Scottish Child Payment | Ongoing | J McCaig |
| | Further expansion of Free School Meals in P6 and P7 | Subject to Scottish Government timescales/funding | |
| | Support establishments to reduce the Cost of the School day in other ways. | Ongoing | M Brennan/QI Team/BSMs |
| | Continue to expand partnership working with MART to embed financial entitlements advice for parents in schools | Ongoing | M Brennan/HTs |
| Children living with poverty are less ready to learn. | Embedding of Social Justice Strategy to ensure staff are supported to understand hidden poverty and are well aware of school context & needs | Ongoing | M Brennan |
| | | | |
| | | | |

8. Approval

If the full impact assessment has been completed, complete below.

| | |
|--|--|
| Name of policy: | Charging for Services – School Meal price increase |
| Date approved: | 15 November 2024 |
| Approved by: (Head of Service/Director level) | Joe McCaig Head of Education Services |
| Department: | Education |

9. No assessment required

If the screening has indicated a full assessment is not required, complete below.

| | |
|---|--|
| Policy/Decision Title | |
| Department/ Service | |
| Responsible officer for taking decision | |

| | |
|--|---|
| Rationale for decision | Please record why an assessment is not required and what your justification is for making that decision. This must include confirmation that the policy has no relevance for people with protected characteristics or impact on human rights or socio-economic inequalities. |
| Declaration: I confirm the decision <u>not</u> to carry out an Equality, Fairness and Rights Impact Assessment has been authorised by: Name and Job Title: Date Authorisation given: | |

Version Control

| Date of change | Amendment | Owner |
|----------------|--|------------|
| Feb 2021 | First publication | C Coburn |
| June 2023 | Introduction and Guidance sections added and formatting changes throughout | C Coburn |
| Feb 2024 | Updating UNCRC section following legislative change | J Breslin |
| October 2024 | Refinements after reviewing | M McIntyre |