Equalities, Fairness and Rights Impact Assessment (EFRIA) - full impact assessment (Template B)

Please ensure you have completed the <u>screening form</u> before completing this full impact assessment template.

Please read the <u>quidance document</u> before you begin. You should refer to this and the supporting materials while completing this form.

General information

The Equality, Fairness and Rights Impact Assessment (EFRIA) is one of our specific duties to <u>assess the impact</u> of applying a new or revised policy, strategy, practice, service or function 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, strategy, practice, service or function does not discriminate unlawfully
- consider how the policy, strategy, practice, service or function might better advance equality of opportunity
- consider whether the policy, strategy, practice, service or function 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 <u>United Nations Convention on the Rights of the Child (Incorporation)</u> (Scotland) Act 2024.

The Equality, Fairness and Rights Impact assessment considers how a policy, strategy, practice, service or function could impact on the needs of individuals protected by the <u>Public Sector Equality Duty</u>, <u>the Fairer Scotland Duty</u> and the <u>UN Convention of the Rights of the Child</u>.

Before you start

Remember that impact assessments should be proportionate to the situation, considering for example:

- the size of the service or scope of the policy, strategy, practice, service or function
- the resources involved
- the numbers of people and stakeholders affected
- the scope of the likely impact
- the vulnerability of the people affected.

The greater the potential adverse impact of the proposed policy, strategy, practice, service or function on a protected group and/or the more vulnerable the group in the context being considered (e.g Disabled people), the more thorough an impact assessment should be.

Therefore, an assessment that identifies any potential **high impacts** (positive or negative) requires a more detailed and thorough evidence base (including consultation) and comprehensive assessment. **Low (positive or negative)** or neutral impacts still require an assessment but are not expected to be as in-depth.

Key:

Positive high	Long lasting or extensive positive impact
Positive low	Short term or limited positive impact
Neutral	No or neutral impact i.e. this group will not experience either a more negative or positive of
	an impact than anyone else
Negative low	Short term or limited negative impact
Negative high	Long lasting or severe negative impact

Contents

Please <u>only complete the sections relevant to the groups identified in your screening as likely to be impacted by your policy, strategy, practice, service or function.</u> The full assessment covers the sections listed below.

1	General information

	Give details of how different groups have been consulted about the policy, strategy, practice, service or function.
2	Impact on individuals or groups with protected characteristics
	How will the policy, strategy, practice, service or function 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?
3	Impact on socio-economic disadvantage
	How will the policy, strategy, practice, service or function impact individuals or groups disadvantaged by poverty, low income, homelessness or lack of or low-level educational qualifications?
4	Impact on Children and Young People
	How will the policy, strategy, practice, service or function impact on the rights and needs of children and young people?
5	Overall assessment, actions, implementation and monitoring
	What is your decision based on the assessment and are there any mitigations or actions that need to be addressed?
8	<u>Approval</u>
	Details of when and who approved the policy, strategy, practice, service or function.

1. General Information

Name of policy, strategy, practice, service or function:	Proposal for 'The Closure of Glen Family Centre and Future Early Learning and Childcare Provision for Children aged 0-3 Years and Residing in the East of the Authority for School Session 2026/27 and Beyond'
Description of policy, strategy, practice, service or function and why it is required:	The Education Department proposes to rationalise the early learning and childcare estate in the east of the authority area, as follows: • The closure of Glen Family Centre
and may it is required.	 0-2 year old places would be transferred to Glenwood Family Centre 2-3 year old children can:

	 Transfer to Glenwood Family Centre Transfer to another ERC establishment which offers 2-3 year old places Transfer to a private, voluntary or independent sector provider 3 year-old children will transition to the most appropriate ELC establishment, as will be the case regardless of the outcome of the proposal. The proposal includes the Education Department's intention to extend the number of locations in the east of the Council area which will offer 2-3 year old places, increasing the uptake of such places, by improving accessibility for parents and carers.
Date EFIRA completed:	21.10.25
Completed by:	Marilyn Brennan, QIO
Lead officer for policy, strategy, practice, service or function:	Joe McCaig, Head of Service
Department:	Education Department

2. Engagement and Consultation

This section will assess how the policy, strategy, practice, service or function has been informed by the experiences of groups impacted by your work and how you have consulted them. See page 9 of the guidance document.

2.1 How have individuals (incl. children & young people) who might be affected by the policy, strategy, practice, service or function 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.

Staff consultation meeting June 2025
Public consultation meeting September 2025
Public consultation 13-August – 25 September 2025

Due to the very young age of children and babies at the centres, children have not been directly consulted and have instead will have been represented by their families.

3. Impact on individuals or groups with protected characteristics

Guidance (page 9 of guidance document)

This section will assess if the policy, strategy, practice, service or function 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 (page 10 of guidance):

- 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
- Input from local Councillors

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.

3.1 Which of the protected characteristic groups is your policy, strategy, practice, service or function is likely to have an impact		What is the level of impact on this group? Please mark. (see key for guidance)				
on? Please mark all that apply.		Positive		Neutral	Negative	
			Low		High	Low
Age						
Disability or long term health condition	Х		Х			
Race						
Sex	Х		Х			
Gender reassignment						
Marriage/civil partnership (only applicable to Council employment						
policy, strategy, practice, service or function)						
Pregnancy/maternity	Х			Х		
Religion/belief						
Sexual orientation						
Providing unpaid care						
Other relevant groups e.g care leavers, people with						
literacy/numeracy barriers, people involved in the criminal justice						
system						
None of the above (leave this section blank and move onto the						
next)						

3.2. Please use the table below to consider how the policy, strategy, practice, service or function may impact on the groups selected in 3.1 through reviewing the evidence, experience and needs of this group.			
Protected characteristic group	Please explain why you have selected this level of impact		

	Explain the impacts (actual and potential) identified from evidence (e.g service information, demographic data, research) and feedback from consultation/engagement
Cove	Glen family centre provides a service for 0-2 year olds. These places will be transferred to Glenwood Family Centre which is 0.2 miles from Glen Family Centre, introducing 15 x 0-2 places at Glenwood Family Centre.
Sex	The reallocation of babies to Glenwood FC will provide a more modern environment for the children. Parents will benefit from 0-5 provision being available on one site, reducing the need for transitions, and the single drop-off point is likely to have a positive impact on parents (most likely female parents) of more than one child under 5 by reducing morning and evening travel time.
	By extending the number of locations in the east of the Council area for 2-3 year old children, the distance required to travel to access such services will reduce; currently just under 75% of children who attend Glenwood for 2-3 places do not live in the ELC community area. This will likely reduce the demands on parents (most likely female parents) with regards to morning and evening travel and result in an increase in the uptake of such places, with better outcomes/experiences for children.
	Almost all staff at Glen Family Centre are female. Those who are transferred to Glenwood Family Centre are likely to experience greater opportunities for professional learning across the full age range of their sector as Glenwood provides learning and childcare up to 5 years old.
Pregnancy/maternity	The proposed closure may have an impact on new and expecting mothers seeking childcare, however based on the demand in each of the last 4 years, Glenwood will be able to comfortably accommodate the demand for 0-2 year old places therefore this impact is likely to be neutral.
	Some pregnant and new mothers may experience a positive impact as a result of babies being able to attend the same facility as older siblings.
	For 2-3 year olds, parents / carers will be able to record their preference of placement ahead of the proposed closure.
Disability/long term health condition	Some children and adults who have experienced trauma and/or have additional support needs can benefit greatly from consistent relationships and environments. For a significant proportion of children (c. 50%), the removal of a transition to another centre at age 3 is likely to benefit children and parents who experience difficulties coping with change for these reasons.

	For those children aged 0-2 who are settled at Glen FC, the impact of moving to another setting sooner than a has the potential to be slightly negative in the shorter term. However this is balanced against the fact that trans 3 would still be required without the close of Glen FC.	
3.3 (a) Which part(s) of the pu Please mark all that apply.	ublic sector equalities duty will the policy, strategy, practice, service or function have an impac	et on?
Eliminate unlawful discrimina	ation, harassment and victimisation and other conduct prohibited by the Equality Act 2010	
running on an upper floor with no lift a	uals differently from others. For example, not recruiting someone as they are deemed too old/young; or a support group access will discriminate against people with mobility issues or wheelchair users	
Advance equality of opportur	nity between people from different groups	
This is when individuals from different children who have additional support a BSL interpreter at health appointme	t backgrounds are treated fairly through providing an equal footing or level playfield to achieve outcomes For example, needs are provided with teaching support to fully participate in the school curriculum or a deaf BSL user is provided with	
	en people from different groups	
	judice or promote understanding between different groups. For example, ensuring new arrivals and refugees are given munities or an LGBTQI+ youth group provide training on LGBTQI+ experiences to a local faith group	
b) If you have ticked any of the	above, please provide a brief explanation why.	
None		

4. Impact on socioeconomic disadvantage

Guidance (page 10 of guidance document)

This section will assess how the policy, strategy, practice, service or function 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, strategy, practice, service or function itself and the way it will be implemented. How will this deliver different experiences for individuals in East Renfrewshire?

4.1 Which groups is your policy, strategy, practice, service or function likely to have an impact on? Please mark all that apply.	What is the level of impact on this group? Please mark. (see key for guidance)			
	Positive Neutral Negative		Negative	

	High	Low	High	Low
People in locality planning areas (Barrhead- Dunterlie, East Arthurlie and Dovecothall, Auchenback, Neilston and Thornliebank)				
More vulnerable types of households (lone parents, large families, pensioner households) or vulnerable groups (offenders and ex offenders; care experiencing children, young people or adults; carers)		X		
Anyone experiencing any of the following issues (unskilled or unemployed of working age; serious and enduring mental health problems; homelessness; drug and/or alcohol problems)		Х		
None of the above (leave this section blank and move onto the next)				

4.2 Please use the table below to consider how the policy, strategy, practice, service or function may impact on the groups selected in 4.1 through reviewing the evidence, experience and needs of this group.			
Identified group	Please explain why you have selected this level of impact Explain the impacts (actual and potential) identified from evidence (e.g service information, demographic data, research) and feedback from consultation/engagement		
	The proposal will result in an overall increase in the availability of 2-3 year old places in the east of the authority. As a result, more eligible 2-year-old children are likely to be able to access the very high quality experiences provided by council settings close to their home. This can potentially have a positive impact on the ability to access paid work for lone parents, in particular female lone parents. We know that around 50% of 2-3 year olds who attend Glen live in Newton Mearns. A number of children are entitled to 2-3 places in Newton Mearns are not taking these up, and we believe this may be due to the need to travel to Glenwood. This can be particularly challenging for more vulnerable households, those with disabilities including mental health concerns, and lone parents. The proposal is therefore likely to have a positive impact on the ability of families in these groups to take up 2-3 year old ELC places.		

5. Impact on Children and Young People

Guidance (page 11 of guidance document)

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

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 Which General Principles of UNCRC are relevant to this policy, strategy, practice, service or function? Please mark all	What is the level of impact on this group? Please mark. (see key for guidance)				
that apply.	Pos	itive	Neutral	Nega	ative
	High	Low		High	Low
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).				
Article 3 : Best interests of the child	Х	Х		
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.				
Article 6: Life, survival and development				
Every child has a right to life and to develop to their full potential.				
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.				
Are there any additional articles relevant to this policy, strategy,				
practice, service or function? Please list all that apply.				
None of the above (leave this section blank and move onto the next)		•	•	

5.2 Are any particular groups of children or young people affected by this policy, strategy, practice, service or function? E.g children with disabilities, young carers or young people with protected characteristics			
Children from more vulnerable types of households (see above)			

5.3 Please use the table below to consider how the policy, strategy, practice, service or function may impact on the articles selected in 5.1 through reviewing the evidence, experience and needs of this group.		
Relevant identified article of UNCRC	Please explain why you have selected this level of impact Explain the impacts (actual and potential) identified from evidence (e.g service information, demographic data, research) and feedback from consultation/engagement	
Article 3	For those children moving from Glen Family Centre to another ELC provision, the impact is likely to be neutral or slightly positive. Glen FC provides a high level of care and learning and this will be continued at another council ELC setting or within a partner provider setting. A significant proportion of children will benefit from not having to transition at age 3. The impact of creating greater availability of 2-3 year old places in the east of the authority is likely to be positive, particularly for children from more vulnerable types of households. Therefore overall impact is evaluated as neutral to low positive.	
	Therefore overall impact is evaluated as fleutral to low positive.	

6. Assessment

You have completed sections 1-5 above and assessed the impact of the policy, strategy, practice, service or function 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. See page 12 of the guidance.

6.1 Assessment of impacts on protected characteristics

In this section please:

- total the number of positive (high/low) and negative (high/low) impacts identified in 3.2
- briefly summarise how this policy, strategy, practice, service or function will impact protected characteristic groups and the public sector equality duties (both positively and negatively) identified in 3.1/3.2/3.3

2 x positive

1 x neutral

For the reasons outlined above we consider that the overall impact of the proposal on individuals with protected characteristics is likely to be positive.

6.2 Assessment of impacts on socio-economic disadvantage

In this section please:

- total the number of positive (high/low) and negative (high/low) impacts (identified in 4.2)
- briefly summarise the impact this activity/proposal/policy, strategy, practice, service or function will have and how it will alleviate or increase socio-economic disadvantage

2 x positive. For the reasons outlined above we consider that the overall impact of the proposal on individuals with protected characteristics is likely to be positive.
6.3 Assessment of impacts on children and young people
 In this section please: total the number of positive (high/low) and negative (high/low) impacts (identified in 5.3) briefly summarise the impact this activity/proposal/policy, strategy, practice, service or function will have
1 x positive 1 x neutral For the reasons outlined above we consider that the overall impact of the proposal on individuals with protected characteristics is likely to be neutral or positive.

6.4 Overall assessment. Having assessed the impact of the policy, strategy, practice, service or function sections 3, 4 and 5, which option best describes your next steps? Please select the most appropriate outcome.

X Continue the policy, strategy, practice, service or function as is
☐ Adjust the policy, strategy, practice, service or function
☐ Stop the policy, strategy, practice, service or function
7. Implementation, actions and monitoring
7.1 How will you communicate information about this policy, strategy, practice, service or function 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, strategy, practice, service or function 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 .
Translation, interpreting and accessible formats are available on request.
7.2 Action plan Based on the information gathered in section 3.1, 4.1 and 5.1 please outline a detailed action plan to: a) address identified gaps in evidence or b) to mitigate negative impacts

Action	Responsible officer(s)	Timescale
N/A – no negative effects identified.		

7.3 Monitoring	
When is the policy, strategy, practice, service or function intended to come into effect?	By August 2026
When will the policy, strategy, practice, service or function be reviewed?	Ongoing basis as part of the Education Department's existing self-evaluation and quality assurance procedures. Ongoing regular consultation as per the Education Authorities statutory duty in accordance with section 50(1) of the 2014 Act, to consult with parents/carers of children under school age about how early learning and childcare is available.
If any committees/partnerships/working groups have oversight of this policy, strategy, practice, service or function please state here	Council's Education Committee Education Department's Education Leadership Team

8. Approval

Name of policy, strategy, practice, service or function:	Proposal for 'The Closure of Glen Family Centre and Future Early Learning and Childcare Provision for Children aged 0-3 Years and Residing in the East of the Authority for School Session 2026/27 and Beyond'
Date approved:	23 October 2025
Approved by:	Joe McCaig (Head of Education Services)

(Senior Manager)	
Department:	Education Department