

## EQUALITY & FAIRER SCOTLAND DUTY (EqFIA) IMPACT ASSESSMENT FORM

<b>Name of Business Unit</b>	Sector Delivery
<b>Name/designation of person(s) responsible for managing/ conducting this process</b>	Paul Foley
<b>Date Complete</b>	05/06/2020

<b>Name of Policy / Function / Service / Strategy / Action Plan / Programme / Project etc.</b> <b>Is it (*delete as applicable)</b> <b>Is the policy contracted out? (*delete as applicable)</b> <b>If yes, who delivers this policy for the organisation?</b> <b>Is responsibility for delivery shared with others? (*delete as applicable)</b> <b>If yes, who are your partners?</b>	Michelin Scotland Innovation Parc (MSIP)	
	*New	
		*Yes
	Michelin Scotland Innovation Parc Limited (MSIP Ltd.)	
		*Yes
	Dundee City Council, SDS and Michelin	

EQUALITY			
Could there be possible impacts or effects in respect of the following protected groups?			
<b>Age</b>	<b>Yes</b>	<b>Disability</b>	<b>Yes</b>
<b>Gender Re-Assignment</b>	<b>No</b>	<b>Marriage &amp; Civil Partnership</b>	<b>No</b>
<b>Pregnancy &amp; Maternity</b>	<b>No</b>	<b>Race</b>	<b>Yes</b>
<b>Religion or Belief</b>	<b>No</b>	<b>Sex</b>	<b>Yes</b>
<b>Sexual Orientation</b>	<b>No</b>	<b>Human Rights</b>	<b>No</b>

FAIRER SCOTLAND DUTY	
Could there be possible impacts or effects in respect of disadvantaged areas/places and/or groups?	
<b>Groups, including the protected groups considered within the Equality section above (for example, young people, disabled people)</b>	<b>Yes</b>
<b>Areas/Places (for example, rural areas, communities experiencing disadvantage)</b>	<b>Yes</b>

<b>EO Champion review by</b>	Katie O'Hara & Susan Sewell	<b>Date</b>	10/06/2020
<b>SRO name and email approval on file</b>	Sarah Petrie	<b>Date</b>	10/06/2020

**1. Identify ALL the Aims of the Policy/Project (consider these questions to prompt answers)**

1. What is the purpose of the policy/project? (consider explicit and implicit aims)
2. Who does the policy/project affect? Is it located in an area of socio-economic disadvantage?
3. Who does the policy/project benefit directly? (e.g. employees/service users; equality groups, other stakeholders)
4. What results/outcomes are intended?

1. To regenerate the current Michelin Dundee Tyre Manufacturing site into a multi-occupancy innovation parc, to attract new sustainable jobs to the area post closure in July 2020.
2. The project affects those employed at the site in addition to the local community. The project will be located in Dundee, identified as an area of socio-economic disadvantage.
3. The project will have several beneficiaries including current employees of Michelin, prospective employees from the surrounding area and wider Dundee City, the future workforce and local suppliers.
4. The focus of the project is to create a significant number of sustainable jobs at the site which at a minimum replaces those lost to the Michelin closure. In addition the targeted 250 people upskilled to competence in sustainable and low carbon technologies. This includes approx. 100 foundation apprenticeships every year, creating competence and job opportunities in the young workforce of Dundee.

## 2. Consider the Evidence (data and information) - (consider these questions to prompt answers)

1. What information or data would it be useful to have? What data (quantitative and qualitative) is available? (in-house/external) How reliable/valid/up-to-date is it?
2. What does the data/information tell you about
  - Different needs?
  - Different experiences?
  - Different access to services, information or opportunities?
  - Different impacts/different outcomes?
  - Socio-economic disadvantage by group or place?
3. Are there any gaps that you should fill now/later by further evidence gathering/commissioning or by secondary analysis of existing data?
4. Are there any experts or stakeholders you should involve/consult now? Have you involved/consulted any experts already? What were their views?

1. It would be useful to have information about employment in the City region, wage levels, diversity statistics for the regional population and whether any groups are underrepresented. With it being likely that the project will have a focus on sustainable mobility and low carbon energy there is likely to be an opportunity to promote STEM based opportunities to woman and other underrepresented groups in the STEM field. Data is available from our Partner in Dundee City Council on the above required data, this is reliable and up to date.

### 2. Employment by Equality Group

	Dundee	Scotland
Overall	67%	74.1%
Women	66.2%	70.3%
Disabled*	40.8%	45.6%
Ethnic Minorities	56.6%	55.4%
16 - 24 Year Olds	50.2%	63.3%

Source: NOMIS (January 2018 - December 2018) - ONS Annual Population Survey  
<https://www.nomisweb.co.uk/reports/lmp/la/1946157411/report.aspx#tabempunemp>

### PLACE

- Dundee is the 5th most deprived Local Authority Area in Scotland as defined by SE Analysis of SIMD
- Dundee has 69 data zones (37% of the total) in the 20% most deprived; this is the 5th highest in Scotland.

PEOPLE	Full time workers - Hourly Pay 2018		
	2016	2017	2018
Dundee City	£12.22	£12.86	£13.39
Scotland	£12.15	£12.47	£12.81

Source: Annual Survey of House and Earnings - Workplace Analysis (NOMIS)

## EQUALITY

- Disadvantage by women accessing employment in STEM – particularly leadership positions with only 17% of directors being female. Young people are also under represented at 3% against a national population of 12%.
- In manufacturing there is also a 17% gender pay gap in comparison to 6% across Scotland as a whole.

Dundee remains the 5th most deprived area in Scotland - based on SIMD data. Dundee has 5.02% of Scotland's top 20% most deprived datazones, and locally 37.33% of local datazones are in the worst 20%. The vast majority of these are within the local commute to work area for MSIP.

Dundee City Council Local Development Plan details related development strategies to boost employment and transport links etc including the Tay Cities Deal which has identified opportunities to reduce fuel poverty.

3. I am currently engaging with expertise in SE (Scott Reid-Skinner) and Dundee City Council (Peter Allan). The project will also engage with Dundee and Angus College who have a strong track record of promoting equality. Skills Development Scotland are another organisations who are involved in the project advisory group and will also be consulted. Scottish Government, Scotland's Future Trust and Scottish Universities are all others the project is being discussed with.

### 3. Assess the likely impact on different groups - (consider these questions to prompt answers)

Does your analysis of the evidence indicate any possible adverse impact on a particular group (age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex and sexual orientation) or does it breach human rights legislation. Mandatory human rights due diligence is required for some projects. Please see [guidance](#).

If it is adverse,

- Does this amount to unlawful discrimination? (See guidance)

In what areas does it have an impact? E.g. access to information, experience of services?

4. Even if there is no evidence of adverse impact, is there an opportunity to actively promote equality or foster good relations between different groups?
5. Is socio-economic disadvantage evident from any particular group or area?

It is unlikely that the project will have an adverse impact on any group. The project is designed to address an adverse event (site closure) so that opportunities result for all. If there are any activities that can be undertaken to ensure the project is as inclusive as possible, the project team welcome these and would appreciate support to implement.

There is nothing that would be done that would be unlawful or discriminate any individual or group highlighted above.

As mentioned previously the project team welcome guidance on any activities that can be undertaken to actively promote equality.

Based on the evidence from the NOMIS statistics, Dundee's employment level across all categories (except for ethnic minorities at 69.2% which outperforms Scottish levels) is lower than the Scottish level. However, the hourly wage is higher and has seen a significant upward trend over the last 3 years (9.6%). The project will have several beneficiaries including current employees of Michelin, prospective employees from the surrounding area and wider Dundee City, the future workforce and local suppliers – which supports the evidence.

From the data a project which is looking to increase employment opportunities for all would be a good intervention. Attention should be given to youth unemployment which ties in well with the Skills Academy, which is part of the MSIP proposition. The Skills Academy will provide

bespoke and core technical skills from National grade upwards and accessible to all. It also includes a target of 100 foundation apprenticeships per year drawing from local schools.

#### 4. Consider alternatives - (use these questions to prompt answers)

1. How can you change your proposal in a way that is proportionate, and will
  - Remove unlawful discrimination or comply with human rights?
  - Reduce any adverse impact?
  - Advance/promote equality?
  - Foster good relations between different groups?
  - Help us achieve our published equality outcomes (See guidance)?
  - Support the reduction in socio-economic disadvantage by groups or areas.
3. Can the aims be met in some other way? What can you do now/later?
4. If the project involves procuring a service or product is there any scope to encourage suppliers to have a greater focus on equality for example signing up to the Business Pledge? Are there any positive action activities you could consider which might address disadvantage experienced by protected groups/areas, like targeting women owned businesses, applying reserved contracts or Community Benefit Clauses? Are there any other project specific actions you could state to help with our equality duties e.g. monitoring of uptake of the service to identify under-representation or encouraging certain groups to participate in the project (see guidance)?
5. What are you recommending?

#### 1. Proposal

- There is nothing being proposed which will lead to unlawful discrimination.
- The project is looking to increase employment opportunities to help tackle the challenges faced in the local economy.
- More focus should be placed on opportunities for youth employment given the region's low performance in this area. Dundee has huge ambitions as a city and it is important that the future workforce have access to employment opportunities.
- MSIP is being developed as an inclusive partnership, seeking input from a broad range of stakeholders. By continuing this approach

opportunities will be presented for relationship development between groups.

- Youth unemployment appears to be the largest area of disparity in Dundee and is something that MSIP should be mindful of.
- We need to be mindful of promoting STEM opportunities to women. This will be done through engaging with EQUATE.

3. We are at the early stages of MSIP and all partners are bought in to the need to attract inclusive employers. It will be part of the tenant consideration criteria at Michelin's request. This is where we can look to introduce prospective tenants to the Business Pledge which can assist with gender pay gap and inclusive growth generally. In addition, the workplace innovation service offered by SE will be engaged particularly around "disabled people and their training through the "disabled and disadvantaged workers project" when this is once more operational.

4. It is unclear at present what procurement will be required but when this does, introducing the Business Pledge and for relevant contracts community benefit clauses will be a requirement. Considerations around apprenticeship schemes and training opportunities will also be considered. All procurement will be delivered using public sector best practice using either SE or DCC procurement mechanisms. There will be opportunities for local suppliers to support the capital and service provision on the parc.

5. I am recommending all the above that I have highlighted. From undertaking this review, I am mindful that Dundee has a lower than Scotland average level of employment in the city (67% v 74.1%), this puts the intervention, which is focused on creating more, better jobs in the correct space.

From the statistical evidence youth unemployment is particularly concerning (50.2% v 63.3%), this is something that needs to be considered when looking at the development of MSIP. Actions around encouraging/insisting that tenants have a youth engagement and employment policy are potential measures which will be considered. The skills academy being proposed for the site will have a large role to play in offering relevant skills development opportunities which will help make young people attractive employment prospects.

The site is adjacent to two SIMD priority areas and a bus ride away (<5miles) from all other SIMD priority areas across the city. Therefore, the location of the intervention is well placed to attempt to tackle local deprivation issues.

All these should be taken into consideration when developing the definition of the site culture and values which all organisations on the site would be expected to implement.

**5. Involve/Consult relevant stakeholders if appropriate - (consider these questions to prompt answers)**

1. What are the views of the people who are likely to be affected or who have an interest about
  - Whether you have identified the right issues?
  - Whether you have proposed suitable modifications?
  - Whether your proposals will meet their needs?
2. Should you involve people in the re-design of the policy?
3. How will you consult once changes have been made?
4. Whom do you need to get views from? (internally/externally/different geographical locations)
5. What methods will you use? (consider “hard to reach” groups)
6. What formats will you use for communicating with different groups?

Michelin has put together an exemplary support programme for their current employees which has seen a large number of them make positive decisions on their future. Michelin had profiled when they expected staff numbers to reduce based on staff retiring or finding a new job they were ahead of target for this in Feb 2020 but due to coronavirus, they are now forecasting a slightly greater number of staff being in difficulty. Michelin will continue to provide support to June 2021 for staff seeking new roles and jobs.

A team including SE, DCC, SDS and Michelin will continue to work in close partnership to ensure all aspects of equality and diversity continue to be considered throughout.

It will be important to remain close to progress on this and progress with potential tenants who can provide job opportunities for the remaining workforce and the appropriate support to make this transition.

In addition, MSIP will have a significant communications programme alongside its tenants, to spread the word around the local economy about opportunities that exist for the whole community.

MSIP will hold public consultation workshops/visits with the local community to continue to develop the very positive relationships already established by Michelin.

**6. Decide whether to adopt this policy/project - (consider these questions to prompt answers)**

1. What were your findings from the consultation/involvement?
2. Taking into account all of the data, information, potential impact issues and consultation feedback, what will you recommend?  
(Choose & state one option)  
**Reject the policy** – there is evidence of actual/potential unlawful discrimination, breach of human rights or no support for socio economic disadvantage identified.  
**Accept the policy** – The EIA demonstrates the policy is robust with no adverse impacts and all opportunities to promote equality/foster good relations and address disadvantage have been taken.  
**Modify the policy** – Adjust the policy to remove barriers or better promote equality and fairness  
**Continue with the policy** – Issues with the policy have been identified but you wish to continue with the policy. Clearly set out justification for doing this. Compelling reasons will be needed.

If the Assessment is on a high level policy/strategy state here if further assessments need to be carried out on projects emanating from the policy/strategy and inform project managers.

Reflecting the above analysis and actions we will be modifying this policy. We have identified that there will be little adverse impact but there are significant opportunities including being able to promote the work to disadvantaged people and regions to address inequalities and socio-economic disadvantage.

**7. Make Monitoring (and review) Arrangements - (consider these questions to prompt answers)**

1. How will you know what the actual effect of the policy/project is at policy level and how does it contribute to national progression with minimising socio-economic disadvantage?
2. In what ways will you monitor? e.g. continuously or irregularly, quantitative methods such as surveys, qualitative methods such as interviews
3. How often will monitoring information be analysed?
4. When will you review the policy/project taking into account any monitoring information?

1. There will be a full monitoring and evaluation framework established for the MSIP work. The project will minimise/aim to negate the negative impact of the closure event. Metrics around job creation and any actions agreed within this document can be recorded as

part of this.

2. This will depend on the nature of what is being monitored, Jobs will need to be evidenced by investors.
3. Monitoring frequency is yet to be agreed.
4. Project review schedule is to be agreed but will be in line with SE policy (minimum annual).
5. The project is in its development phase and further actions addressing inclusive growth may become evident in the as we get nearer to the project being fully developed and ready to go forward for approval.

## **8. Equality Impact Assessment review**

Please forward the completed document to your equality champion for review. This should then be approved by the SRO and returned to your champion for publication on the Scottish Enterprise external website.

## **9. Summary of Actions**

List any actions agreed and indicate dates for review.

1. Consider the role of the MSIP skills academy in increasing the skill set of the local workforce, the young workforce (18-24) and retraining/skilling opportunities
2. Implement a clear policy on tenants attracted to locate on site around the employment practices and opportunities they are expected to provide.
3. This will be subject to ongoing review following PLC guidance.