

PART B – Equality Analysis Form

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality and diversity.

This form:

- Can be used to prompt discussions, ensure that due regard has been given and remove or minimise disadvantage for an individual or group with a protected characteristic
- Involves looking at what steps can be taken to advance and maximise equality as well as eliminate discrimination and negative consequences
- Should be completed before decisions are made, this will remove the need for remedial actions.

Note – An Initial Equality Screening Assessment (Part A) should be completed prior to this form.

When completing this form consider the Equality Act 2010 protected characteristics Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc. – see page 11 of Equality Screening and Analysis Guidance.

1. Title	
Equality Analysis title: Ethical Procurement Policy Refresh 2025	
Date of Equality Analysis (EA): 28 May 2025	
Directorate: Finance & Customer Services	Service area: Financial Services
Lead Manager: Karen Middlebrook	Contact number: 01709 334755
Is this a: <input checked="checked" type="checkbox"/> Strategy / Policy <input type="checkbox"/> Service / Function <input type="checkbox"/> Other If other, please specify	

2. Names of those involved in the Equality Analysis (Should include minimum of three people) - see page 7 of Equality Screening and Analysis Guidance

Name	Organisation	Role (eg service user, managers, service specialist)
Karen Middlebrook	Rotherham Metropolitan Borough Council	Head of Procurement
Rob Mahon	Rotherham Metropolitan Borough Council	Assistant Director; Financial Services
Louise Hayter	Rotherham Metropolitan Borough Council	Procurement Performance & Compliance Manager

3. What is already known? - see page 10 of Equality Screening and Analysis Guidance

Aim/Scope (who the Policy/Service affects and intended outcomes if known)

This may include a group/s identified by a protected characteristic, others groups or stakeholder/s e.g. service users, employees, partners, members, suppliers etc.)

This policy pulls together a range of other policy decisions / commitments to form an umbrella Ethical Procurement Policy aimed at driving improved ethical practice through the Council's supply chain. The policy therefore impacts suppliers wanting to engage in procurement activity with the Council, with Rotherham residents, business and communities being the end beneficiaries of any outcomes achieved.

What equality information is available? (Include any engagement undertaken)

This policy pulls together a range of other policy decisions / commitments made by the Council to form an umbrella Ethical Procurement Policy. Equality considerations was considered as part of these individual decisions / commitments made.

From a purely procurement perspective, the Procurement team already collate information on the location suppliers are based (Rotherham, South Yorkshire, Yorkshire and Humber, National and International).

Are there any gaps in the information that you are aware of?

Work is ongoing to identify analysis to be able to better understand the size of organisations doing business with the Council (i.e. Micro, Small, Medium, Large) aswell as the company trading type (i.e. PLC). Under the Procurement Act 2023, the Council has a duty to give regard to the barriers faced by SMEs in engaging in procurement activity, so this data will help inform our performance in this area.

What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?

This policy pulls together a range of other policy decisions / commitments made by the Council to form an umbrella Ethical Procurement Policy. Relevant monitoring arrangements will be in place for each of these individual decisions / commitments (were appropriate).

In addition, some of the policies / commitments made are used to inform how Services draft specification requirements for future contracts, and therefore the monitoring arrangements will be applicable at the contract level.

Engagement undertaken with customers. (date and group(s) consulted and key findings)

N/A

Engagement undertaken with staff (date and group(s) consulted and key findings)

Direct engagement has not been undertaken with Staff but various training workshops around procurement is routinely undertaken throughout the year where procurement legislation, process and procedure is covered, but also specific reference to the Ethical Procurement Policy.

4. The Analysis - of the actual or likely effect of the Policy or Service (Identify by protected characteristics)

How does the Policy/Service meet the needs of different communities and groups? (Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity) - see glossary on page 14 of the Equality Screening and Analysis Guidance)

Individual officers within Service Areas are responsible for considering the needs of different communities and groups for each individual commissioning / procurement process they undertake and this approach will be documented through the pre-procurement business case demonstrating how consideration has been given to this policy, which is approved by the relevant Service Area Assistant/Strategic Director.

Does your Policy/Service present any problems or barriers to communities or Groups?

Individual officers within Service Areas will be responsible for considering problems or barriers to communities or groups for each individual commissioning / procurement process and this will be documented through the pre-procurement business case, which will be approved by the relevant Service Area Assistant / Strategic Director.

The Council has a legal obligation to consider the engagement of Small to Medium Enterprises (SMEs) in it's procurement activity, therefore in delivering against the differing policy commitments in the Ethical Procurement Policy careful consideration must be given

by Services in the development of their pre-procurement activity to ensure that the requirements identified are presented in a proportionate manner so as not to act as a barrier for SMEs to engage in the process.

Does the Service/Policy provide any positive impact/s including improvements or remove barriers?

In the financial year 2023/24 the Council spent c£425m with third party suppliers / contractors on a range of Goods, Works and Services. Procurement is therefore considered an enabler in assisting the Council to deliver its strategic objectives by using its purchasing power to drive socio-economic and environmental improvements for its residents and society at large through its supply chain.

Individual officers within Service Areas will be responsible for considering positive impacts for each individual commissioning / procurement process and this will be documented through the pre-procurement business case, which will be approved by the relevant Service Area Assistant / Strategic Director

What affect will the Policy/Service have on community relations? (may also need to consider activity which may be perceived as benefiting one group at the expense of another)

It is not expected there will be a significant impact. The key objectives from the Procurement Act 2023 are detailed below:

Section 12 – Covered procurement: objectives

1. In carrying out a covered procurement, a contracting authority must have regard to the importance of
 - a. delivering value for money;
 - b. maximising public benefit;
 - c. sharing information for the purpose of allowing suppliers and others to understand the authority's procurement policies and decisions;
 - d. acting, and being seen to act, with integrity.
2. In carrying out a covered procurement, a contracting authority must treat suppliers the same unless a difference between the suppliers justifies different treatment.
3. If a contracting authority considers that different treatment is justified in a particular case, the authority must take all reasonable steps to ensure it does not put a supplier at an unfair advantage or disadvantage.
4. In carrying out a covered procurement, a contracting authority must
 - a. have regard to the fact that small and medium-sized enterprises may face particular barriers to participation, and
 - b. consider whether such barriers can be removed or reduced.

When procuring individual contracts, officers within Service Areas will be responsible for considering community relations specific to their requirement and this will be documented through the pre-procurement business case, which will be approved by the relevant Service Area Assistant/Strategic Director.

Please list any **actions and targets** that need to be taken as a consequence of this assessment on the action plan below and ensure that they are added into your service plan for monitoring purposes – see page 12 of the Equality Screening and Analysis Guidance.

5. Summary of findings and Equality Analysis Action Plan

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic - See page 11 of the Equality Screening and Analysis guidance

Title of analysis: Ethical Procurement Policy Refresh 2025
Directorate and service area: Finance & Customer Services / Financial Services
Lead Manager: Karen Middlebrook
Summary of findings:
<p>There are no direct findings as a result of the refresh of this policy. Equality considerations were considered at the time the individual policy decisions commitments were made and the principles of equality are embedded into procurement legislation that describes how procurement activity is to be undertaken.</p> <p>For future commissioning / procurement projects, equalities will be considered and incorporated into the pre-procurement business case which will be approved by the relevant Service Area Assistant/Strategic Director.</p>

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)

*A = Age, D= Disability, S = Sex, GR Gender Reassignment, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage. C= Carers, O= other groups

6. Governance, ownership and approval

Please state those that have approved the Equality Analysis. Approval should be obtained by the Director and approval sought from DLT and the relevant Cabinet Member.

Name	Job title	Date
Karen Middlebrook	Head of Procurement	28/05/2025
Rob Mahon	Assistant Director; Financial Services	02/06/2025

7. Publishing

The Equality Analysis will act as evidence that due regard to equality and diversity has been given.

If this Equality Analysis relates to a **Cabinet, key delegated officer decision, Council, other committee or a significant operational decision** a copy of the completed document should be attached as an appendix and published alongside the relevant report.

A copy should also be sent to equality@rotherham.gov.uk For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page.

Date Equality Analysis completed	28 May 2025
Report title and date	Ethical Procurement Policy Refresh 2025
Date report sent for publication	

Date Equality Analysis sent to Performance, Intelligence and Improvement equality@rotherham.gov.uk	29.05.25
---	----------