

Equality Impact Assessment

Section 1 – Equality Impact Assessment details

1.1 Title of initiative (policy/strategy/service/decision/activity)

The National Lottery Heritage Fund's strategy implementation.

1.2 Reason for Equality Impact Assessment

Introduction and implementation of new strategy.

1.3 Responsible team and lead contact

Strategy team and Strategy Implementation team – Madeleine Coupe (Head of Strategy) and Liz Bates (Head of Programme, Strategy Implementation).

1.4 Date of assessment completion

Updated 1 February 2024

1.5 Review frequency and date of first review

Developed in February 2023 and reviewed in November 2023 and March 2024 as part of strategy implementation.

Section 2 – About this initiative

2.1 Outline of initiative

The National Lottery Heritage Fund (Heritage Fund) has developed a 10-year strategy for 2023–2033. The strategy has replaced the existing Strategic Funding Framework (SFF) which comes to an end in March 2024. The strategy, Heritage 2033, sets out a new vision for the UK's heritage and the Heritage Fund's ambitions and priorities for the next 10 years. At the heart of Heritage 2033 is a simplified and flexible investment framework for delivering the vision and investment principles through:

- National Lottery Heritage Grants for all types of heritage projects with the majority of decisions made at local level.
- Strategic interventions to tackle issues at large and cross-territory scale.
- Partnerships that combine resources and expertise to create investments with greater impact.

- A focus on place, landscape and nature, heritage in need and responding to opportunities and emergencies.

Applications for National Lottery Grants for Heritage from £10,000 to £250,000 and development round grants over £250,000 under our Strategic Funding Framework closed in November and December 2023, small grants from £3,000 to £10,000 closed in December 2023. In January 2024, applications re-opened for grants from £10,000–£250,000 and £250,000–£10m under Heritage 2033 as National Lottery Heritage Grants. Work is progressing well on the other strands.

Individual equality impact assessments will be developed where appropriate and where there are any changes in strategy or policy.

2.2 Aims and objectives

The aim of the new 10-year strategy is to support heritage by investing £3.6 billion raised for good causes by National Lottery players to make a decisive difference for people, places and communities. The strategy articulates the Heritage Fund's vision "for heritage that is valued, cared for and sustained for everyone, now and in the future" and explains the four investment principles that underpin the Heritage Fund's support for the UK's heritage:

- saving heritage
- protecting the environment
- inclusion, access and participation
- organisational sustainability

2.3 Projected outcomes

The intended impacts for each principle include:

Saving heritage: Through our support for conserving heritage, we can ensure it remains accessible, relevant, sustainable and valued.

Protecting the environment: Through our support for natural heritage, landscape recovery and our focus on environmentally sustainable projects, we will help the UK meet its nature recovery targets and mitigate the impact of climate change on heritage.

Inclusion, access and participation: We will support the organisations we work with to achieve greater inclusion, diversity and access to heritage. Everyone will have opportunities to learn, develop new skills and explore heritage, regardless of background or personal circumstances.

Organisational and financial sustainability: We will support heritage to be adaptive and resilient, increasing capacity and skills to ensure a sound long-term future. We will encourage new investment for heritage to contribute to communities, local and regional economies.

Within each of the four principles there is a “By 2033 we will have” section, which includes more detail on the Heritage Fund’s intended impacts.

2.4 Links to other Heritage Fund policies or strategies

Is this linked to any of the Heritage Fund’s other policies or strategies, and how, if applicable, does this support the Heritage Fund’s outcomes?

The strategy sets the direction for all funding decisions and will be at the centre of delivering the Heritage Fund’s ambitions. Three-year delivery plans will set out in more detail how the strategy will be implemented. The first was published in July 2023.

The strategy implementation will impact policies and strategies on:

- the grant process and the collection of data to understand and monitor the impact of the strategy
- strategic initiatives

2.5 Which aspects of this initiative impact equality (both positively and negatively)?

We see heritage as broad and inclusive. Heritage can be anything from the past that people value and want to pass on to future generations.

One key change is moving from nine ‘outcomes’ in SFF to four investment principles, as described above. The investment principles underpin all our work and are all of equal significance. One of the investment principles is ‘inclusion, access and participation’.

Heritage 2033 states that “we will ask the projects we fund to take all four investment principles into account in their applications, but the strength of focus, and emphasis on each principle, will be for applicants to decide and demonstrate”.

Section 3 – Data and evidence

3.1 Summary of evidence

Summary of evidence considered which can support with the identification of whether this policy/strategy/service/decision/ activity has any adverse impacts on groups with protected characteristics (including statistics, survey results, consultation documents, reports, research, comparative work from external sources and other Civil Service Bodies). Add here, any concerns that have been raised.

Below is the research, data and learning which has underpinned the implementation of Heritage 2033 to ensure inclusivity and no adverse impacts on groups with protected characteristics.

The National Lottery Heritage Fund strategy engagement survey and strategy development research (2022)

The strategy development process involved engagement with over 4,000 stakeholders and members of the public to understand their views on heritage and the Heritage Fund's future direction. Our [engagement survey](#) and [strategy development research](#) showed that inclusion and diversity was a priority for the heritage sector but also cited challenges regarding training and maintaining skilled staff on equality, diversity and inclusion (EDI). Despite steps to make heritage more accessible and inclusive, stakeholders feel the sector can go further to increase workforce (including volunteers) diversity and improve access to heritage, particularly for under-served communities, and that the Heritage Fund has a significant role to play in achieving greater progress on inclusion.

This research provided evidence for how the Heritage Fund's strategy implementation can support inclusion and diversity including:

- A simplification of the application process.
- Emphasis on funding smaller, community-level, volunteer-led organisations and supporting them to applying for funding.
- Funding for projects with community participation, skills creation and volunteer-led projects.
- A more collaborative approach to working with grantees and other funders, facilitating partnerships and building more equal relationships. Also, offering more 'funder-plus' style support, providing tools and training to the organisations they work with.

Equality, Diversity and Inclusion Review update report (2022)

The [2022 EDI research](#) aimed to understand how the Heritage Fund can be a more inclusive and equitable funder. Although this research was based on the previous Strategic Funding Framework, it provides useful evidence to inform Heritage 2033 and its implementation. Key findings and recommendations included:

- The role of heritage for social impact such as for wellbeing, community cohesion and social justice was important to participants and it was recommended the Heritage Fund adopt a social impact and wellbeing approach to heritage in communication and strategy.
- Participants did not understand what heritage meant to the Heritage Fund and did not perceive it as funding their work. It was recommended the organisation review its communication around heritage and target specific groups that are not sufficiently engaging with the Heritage Fund.
- There is a need for a more nuanced approach to talking about the inclusion outcome which moved beyond participation in heritage to being about inclusive practice which involves and empowers people.
- Address barriers in the funding process, for example by streamlining application processes and increasing transparency.
- Pilot processes that enable members of under-served groups and the local community to play a bigger role in decision making alongside Heritage Fund staff and committees.
- There are gaps in the Heritage Fund's data collection approach around EDI and a need to improve this.

Internal grant data analysis

Since spring 2021, 2,015 applicants to the Heritage Fund have provided information about how they identify themselves (see appendix). In comparison to UK population data (see appendix), applicants are not representative of the population for younger people, certain ethnic groups including Asian and Asian British, and people with disabilities. In addition to this, data analysis conducted as part of the EDI research revealed organisations led by or focused on under-served groups have lower success rates overall and specifically in awards for larger grants.

Areas of Focus evaluation

The Heritage Fund's [Areas of Focus work](#) has provided additional evidence for how to increase success rates and applications from more diverse organisations. Since 2019, local teams have worked closely with 13 geographical areas that have historically received lower levels of investment and that experience high levels of deprivation. The evaluation has shown that positive actions and reasonable adjustments made by staff, including one-to-one support, strategic influencing and

endorsement, local area-led evidence work and cooperation and coordinated working have been successful in bringing in new, more diverse applications to the Heritage Fund.

3.2 Gaps in information

Gaps in information which make it difficult or impossible to form an opinion on how your proposal may affect people with protected characteristics. Include what these gaps are, and how and when you plan to collect additional information.

There are gaps in data collection for some aspects of EDI to monitor performance, measure impact and inform practice, strategy and policy making at the Heritage Fund. We are addressing the gaps in data collection by developing an impact measurement framework as well as reviewing our end-to-end processes and requirements.

Section 4 – Considerations of equality impact

Impact can be a lasting consequence or change in people’s lives. It can be positive or negative. Some changes may have a negative impact on all workers. What the equality impact assessment should show is whether there is a disproportionate negative impact on a particular group. If you identify a negative impact on a particular group, you must note any actions you have taken to mitigate this.

For most of the below listed groups the positive and negative impacts of the strategy are the same across the protected characteristics.

The potential positive impacts are:

- Inclusion is one of the [four core investment principles](#) articulated in the strategy and should result in positive change through “supporting greater inclusion, diversity, access and participation in heritage.”
- The inclusion investment principle will support funding for organisations led by or working with people from the under-served groups.
- The Heritage Fund asks applicants to define what heritage means to them, as opposed to imposing a strict definition. This allows for a wider range of heritage to be supported through projects.
- By taking an applicant led approach the Heritage Fund allows organisations to choose to focus on the inclusion investment principle, which should enable higher-quality projects led by and for people with protected characteristics.
- The strategy articulates that there will be increased partnership working by the Heritage Fund which will allow us to develop a better reach for those groups led by and for people with protected characteristics.

- The strategy explains the inclusion investment principle will support individuals and communities from protected groups who are under-served across the UK heritage sector including workforce, governance and engagement.
- The increased thresholds for larger-scale projects should enable organisations to make a greater impact in supporting groups under-served by heritage.

The potential negative impacts are:

- Our strategy requires applicants to take all four investment principles into account but the strength of focus and emphasis on each investment principle will be for applicants to decide. Some applications may have less focus on inclusion, access and participation. This impact will be mitigated the following:
 - Setting out the benefits of inclusion, access and participation in our good practice guidance and communications.
 - Seeking a balance across the four investment principles at a portfolio level, addressing any imbalances through targeted interventions.
 - Communicating expectations on the inclusion investment principle within the Heritage Fund's guidance and assessment.
 - Encouraging inclusive practice through grant monitoring, communications, policy work, strategic partnerships and initiatives and targeted work by Engagement teams for applicants, projects and the wider sector.

Age: None identified except the cross-characteristic positive and negative impacts identified above.

Disability: None identified except the cross-characteristic positive and negative impacts identified above.

Gender (identity and expression, including the trans, non-binary and gender queer + communities): None identified except the cross-characteristic positive and negative impacts identified above.

Marriage and civil partnership: No impact either positive or negative has been established for this protected characteristic.

Pregnancy and maternity: None identified except the cross-characteristic positive impacts identified.

Race: None identified except the cross-characteristic positive and negative impacts identified above.

Religion or belief: None identified except the cross-characteristic positive and negative impacts identified above.

Sex: No impact either positive or negative has been established for this protected characteristic.

Sexual orientation: None identified except the cross-characteristic positive and negative impacts identified above.

In addition:

Socio economic status: Although this is not a protected characteristic, intersectional inequalities and disproportionate economic disadvantages are experienced by those with a low socio-economic status.

The positive impact from the strategy is the social impact it can have through the investment principles and our focus on investing in place. Through our Heritage Places initiative, 11 places were chosen through an evidence-based approach which combined new quantitative research with local insight to identify places with heritage needs, opportunities and potential.

Parents/carers: While also not a protected characteristic, those with parental or caring responsibilities can be disadvantaged due to the barriers they face in participation. The positive impact of the strategy is that it encourages creativity from applicants in understanding the barriers for specific audiences and designing their programmes accordingly. There will be no difference in terms of negative impact than those listed above.

Section 75 of The Northern Ireland Act: As a UK-wide funder, we must comply with both the Equality Act 2010 and Section 75 of the Northern Ireland Act.

There are no additional impacts on equality of opportunity for each of the Section 75 equality categories:

- religious belief
- political opinion
- racial group
- age
- marital status
- sexual orientation
- men and women generally
- disability
- dependants

There is no likely impact on good relations between people of different religious belief, political opinion or racial group.

There are opportunities to better promote good relations between people of different religious belief, political opinion or racial group through involving a more diverse range of people in heritage, removing barriers to access and participation and supporting all communities to explore and share their heritage.

There are no potential impacts of the policy/decision on people with multiple identities other than those highlighted above.

Section 5 – Risks

Implementing the inclusion, access and participation investment principle

See negative impact in section 4.

Pace and level of change

The speed and level of change of the strategy presents risks to effectively integrating inclusion as the strategy is implemented. This risk will be mitigated by integrating inclusion throughout delivery planning by developing individual equality impact assessments where appropriate.

Section 6 – Resources required

- Resource to monitor and evaluate the impact of the strategy across its 10-year life. Our long-term strategy is supported by three-year delivery plans, setting out how the aims of the strategy will be delivered. They will allow us to take a flexible approach, adapting to heritage sector needs and responding to external events or opportunities over the 10 years.
- Engagement staff to deliver the strategy changes which impact inclusion.
- Review of resource, knowledge, skills and culture across the Heritage Fund to ensure inclusion is embedded across departments, teams and roles.
- Executive and Governance teams to ensure inclusion is integral to decision making for strategy implementation and grant awards.

The specific resource will be worked out during three-year delivery planning and reviewed on an annual basis for the duration of the strategy.

Appendix: Applicant data at February 2023 (reviewed annually)

Since the Heritage Fund's launch of our Get funding for a heritage project service in spring 2021, those filling in the application form have provided information about how they identify themselves.

2,015 people have filled in the survey providing the following demographic information. The tables also include the latest UK population data.

Age

Table 1: Applicant data for age

| Age | Number | Percentage |
|-------------------|--------------|------------|
| Under 18 | 24 | 1.3% |
| 18 to 30 | 153 | 8.4% |
| 31 to 40 | 273 | 14.9% |
| 41 to 50 | 340 | 18.6% |
| 51 to 60 | 411 | 22.4% |
| 61 to 70 | 389 | 21.2% |
| 71 to 80 | 227 | 12.4% |
| 81 to 90 | 15 | 0.8% |
| Subtotal | 1,832 | n/a |
| Prefer not to say | 24 | n/a |
| Total | 1,856 | n/a |

[The Office for National Statistics' estimates for UK population](#) categorise age differently but can provide context for the above figures:

Table 2: UK population data for age

| Age | UK percentage |
|--------------------|----------------------|
| 15–19 | 5.7% |
| 20–29 | 12.5% |
| 30–39 | 13.6% |
| 40–49 | 12.6% |
| 50–59 | 18.6% |
| 60–69 | 10.9% |
| 70–79 | 8.7% |
| 80–89 | 4.1% |
| 90 and over | 0.9% |

Ethnicity

Table 3: Applicant and UK data for ethnicity

| Ethnicity | Number | Percentage | England and Wales population | Scotland | Northern Ireland |
|------------------------|--------------|------------|------------------------------|----------|------------------|
| Arabic | 6 | 0.4% | 0.6% | - | 0.1% |
| Asian or Asian British | 49 | 3.0% | 9.3% | 2.7% | 1.6% |
| Black or Black British | 88 | 5.4% | 4% | 1% | 0.6% |
| Jewish | 6 | 0.4% | - | - | - |
| Mixed ethnicity | 18 | 1.1% | 2.9% | 1% | 0.8% |
| Other | 312 | 19.3% | 2.1% | - | 0.2% |
| White | 1,136 | 70.3% | 81.7% | 96% | 96.6% |
| Subtotal | 1,615 | n/a | n/a | n/a | n/a |
| Prefer not to say | 4 | n/a | n/a | n/a | n/a |
| Total | 1,619 | n/a | n/a | n/a | n/a |

For more information on the data in the above table, see:

- [Population of England and Wales – Ethnicity facts and figures](#)
- [Ethnicity, Scotland – Scotland's Census](#)
- [Census 2021 main statistics for Northern Ireland – Northern Ireland Statistics and Research Agency](#)
- the Scotland 'mixed ethnicity' group is mixed or other ethnic groups
- the England and Wales 'white' ethnic group is made up of White British (74.4%), White other (6.2%), White Irish (0.9%), Roma (0.2%) and Gypsy or Irish traveller (0.1%)

Disability

Table 4: Applicant and UK data for disability

| Disability | Number | Percentage | UK population |
|--------------------------|---------------|-------------------|----------------------|
| No | 1,530 | 84.3% | - |
| Not sure | 20 | 1.1% | - |
| Other | 34 | 1.9% | - |
| Yes | 230 | 12.7% | 22% |
| Subtotal | 1,814 | n/a | n/a |
| Prefer not to say | 38 | n/a | n/a |
| Total | 1,852 | n/a | n/a |

For more information about the UK population data in the above table, see [Family Resources Survey: financial year 2019 to 2020 – GOV.UK.](#)

Sexual orientation

Table 5: Applicant and UK data for sexual orientation

| Sexual orientation | Number | Percentage | UK population |
|-----------------------|--------------|------------|---------------|
| Asexual | 15 | 0.9% | 0.06% |
| Bisexual | 74 | 4.4% | 1.3% |
| Gay/lesbian | 80 | 4.8% | 1.8% |
| Heterosexual/straight | 1,477 | 87.7% | 93.6% |
| Other | 19 | 1.1% | 0.7 |
| Pansexual | 19 | 1.1% | - |
| Subtotal | 1,684 | n/a | n/a |
| Prefer not to say | 157 | n/a | n/a |
| Total | 1,841 | n/a | n/a |

For more information about the UK population data in the above table, see [Sexual orientation, UK – Office for National Statistics](#).

Sex and gender

Table 6: Applicant data – gender

| Gender | Number | Percentage |
|------------------------------|---------------|-------------------|
| Agender | 1 | 0.1% |
| Gender non-conforming | 4 | 0.2% |
| Man | 784 | 43.0% |
| Non-binary | 15 | 0.8% |
| Other | 15 | 0.8% |
| Woman | 1,006 | 55.1% |
| Subtotal | 1,825 | n/a |
| Prefer not to say | 31 | n/a |
| Total | 1,856 | n/a |

Table 7: UK population data – sex

| Sex | England and Wales | Scotland | Northern Ireland |
|---------------|--------------------------|-----------------|-------------------------|
| Female | 51% | 52% | 51% |
| Male | 49% | 48% | 49% |

For more information on the data in the above table, see:

- [Age and sex, England and Wales – Office for National Statistics](#)
- [Census 2021 age and sex demographics for Northern Ireland – Northern Ireland Statistics and Research Agency](#)

Table 8: UK population data – gender identity different from sex registered at birth

| Gender | England and Wales |
|--|--------------------------|
| Gender identity different from sex registered at birth but no specific identity given | 0.24% |
| Trans woman | 0.1% |
| Trans man | 0.1% |
| Non-binary | 0.06% |
| All other gender identities | 0.04% |

For more information on the data in the above table, see:

- [Gender identity, England and Wales – Office for National Statistics](#)
- Northern Ireland and Scotland census data will be included when released