

# **Equality Impact Assessment: initial screening**

#### What is being assessed by whom?

| Name of the policy <sup>1</sup>  |
|--|
| Matching priorities and resources project  |
| Name of person leading the assessment <sup>2</sup>   |
| Muriel Crout   |
| Names of other team members  |
| Jane Macdonald, Daniel Gotts, Kath Leys  |
| Is this a new or existing policy?  |
| New 🖂 Existing being reviewed 🗌  |
| If existing, then please check to see whether a previous EqIA is available to provide a basis for this assessment. |

### **Initial screening**

|  | Yes         | No        |
|--|-------------|-----------|
| Does the policy impact on people? (e.g. on service users, businesses, employees, wider community) - <b>Potentially</b> |             |           |
| Will it have a significant effect on how other organisations operate?  |             | $\square$ |
| Does it relate to an area where SNH has set equality outcomes <sup>3</sup> ?   | $\boxtimes$ |           |
| Does it relate to an area where there are known inequalities? ( Senior management gender balance, gender pay gap)      |             |           |

<sup>&</sup>lt;sup>1</sup> The term policy is shorthand for policies, provisions, criteria, functions, practices and activities including the delivery of services.

<sup>&</sup>lt;sup>2</sup> Person leading on the policy development

<sup>&</sup>lt;sup>3</sup> Through the delivery of our services people who are under-represented as a result of a protected characteristic are more able to visit and experience the outdoors

Our workforce broadly reflects the diversity of the population of Scotland

Our workforce welcomes, values and promotes diversity

The gender pay gap is reduced

If you answered **Yes** to any of the above, please proceed to Stage 1 of the EqIA form.

If you answered **No** to all of these, you do not need to carry out an EqIA so proceed to sign and complete the statement below.

#### An EqIA is <u>not needed</u> Date:

| Signed   | Date       |
|--|------------|
| Lead officer: - Muriel Crout                                   | 04.06.2015 |
| Responsible officer <sup>4</sup> : - Jane Macdonald 02.07.2015 |            |

Please now publish the initial screening section of the form in eRDMS file B239231 and email confirmation to <u>diversity@snh.gov.uk</u>. Please also retain a copy with your policy documents.

<sup>&</sup>lt;sup>4</sup> Person with overall responsibility for the policy.



# **Equality Impact Assessment: assessing impact**

#### Stage 1. The purpose of the policy, service, activity etc.

| What is the purpose of the policy?  | This is a major change programme which will lead to having effective and transparent, cross-organisation prioritisation of what is needed to be done and how it will be resourced.  |
|---|---|
| Who does the policy affect?<br>(employees, customers, equality<br>groups, stakeholders) | The project has the potential to affect all SNH employees due to any new ways of working being undertaken. It may, therefore, have the potential to affect partner organisations or even the general public.  |
|   | There will be an impact on senior management where there is currently a gender imbalance. This will be by a restructure or redistribution of roles and tasks.   |
| What results/outcomes are intended?   | <ul> <li>There will be clearly understood roles, responsibilities and management accountability (at F grade and above) that underpin SNH work and empower SNH staff.</li> <li>Decision making will be proportionate, timely, outcome-focused and streamlined.</li> <li>Risk management will be proportionate.</li> <li>Change and improvement is accepted as a key area of SNH work. SNH will understand the need for change, where and when it is required and plan effectively to accommodate and manage it.</li> </ul> |

#### Stage 2. Relevance to the needs of the general equality duty

Please consider which aspects of the policy are relevant to the three needs of the general equality duty

|  | Comment   |
|--|---|
| Eliminate unlawful discrimination              | SNH's policies aim to treat all employees equally and this project will continue that. There will be no disadvantage to employees with protected characteristics either directly or indirectly.   |
| Advance equality of opportunity                | SNH already operates working flexibly which can assist employees with caring responsibilities. Better staff deployment will occur without prejudice and in consideration of protected characteristics, as will this project. The implementation of this project will be one of consistent application across SNH. |
| Foster good relations between groups of people | Employment Law and Case Law will be considered and utilised to ensure the project is implemented in relation to up to date legislation and good practice.   |

#### Stage 3. To which of the equality groups is this policy relevant?

| All        |           | Sexual orientation      |  |
|------------|-----------|-------------------------|--|
| Age        | $\square$ | Gender reassignment     |  |
| Disability | $\square$ | Pregnancy and maternity |  |
| Gender     | $\square$ | Religion and belief     |  |
| Race       |           |                         |  |

If you decide that the assessment is not relevant to some groups, please say why below.

This change project will not impact the above unchecked groups as SNH ensures that any change measures would be implemented as fairly and impartially as possible. As a gender imbalance has been identified in the higher management levels and the potential for restructure there may be a low risk of negative impact. Impacts on disability can be mitigated through ensuring changes are communicated and facilitated through suitable mediums. Age may also have a slight negative risk due to research showing the older employees can become demotivated by any change (regardless of whether it is positive or negative).

#### Stage 4. Evidence

Please consider what evidence is available to help you identify the impact the policy may have on people amongst the relevant groups you have identified? Both quantitative (statistics etc.) and qualitative (event feedback etc.) are equally valid. Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, <u>Scottish Government Evidence Finder</u>, the views of equality groups, as well your own experience of working in this area etc.

Remember to consider whether this requires you to consult relevant equality groups. Where it is not possible to gather new information in time to inform the assessment, consider including such actions in your plans to monitor and review the policy.

| Protected characteristic | Evidence  | Source   | Gaps and actions taken  |
|--------------------------|---|--|---|
| Age                      | SNH has an aging workforce,<br>25-34 years - 13.84%<br>35-44 years - 29.30%<br>45-54 years - 36.16%<br>55-64 years - 17.47%   | Equality and Diversity<br>Employee Monitoring<br>Report 2015 | Engagement at a local level<br>regarding the implementation of<br>the project to ensure clarity and to<br>identify the benefits of this way of<br>working to all.   |
| Disability               | Possible associated impact – ability to<br>understand the implementation of this project<br>and physical impact for example, difficulty<br>reading due to visual impairment.<br>Disabled - 1.75%<br>Preferred not to Say - 5.11%<br>Not Declared - 23.92% | Equality and Diversity<br>Employee Monitoring<br>Report 2015 | <ul> <li>Written information is available in a larger format.</li> <li>Employees with hearing difficulties have access to LOOP systems and document to audible speech software.</li> <li>Drop in sessions to local offices and information regarding MPR implementation is cascaded in</li> </ul> |

|                                |  |  | different ways, e-mail, face to face meetings etc.  |
|--------------------------------|--|--|---|
| Gender                         | The overall gender pay gap between men and<br>women in SNH at 5 <sup>th</sup> February 2015 was<br>13.7% (including part time workers) with a<br>total average hourly pay for men of £17.11<br>and £14.78 for women (excluding overtime).<br>Breakdown at senior level in 2015 (F G and H<br>grade) by head count - 26 male, 13 female | Equality and Diversity<br>Employee Monitoring<br>Report 2015   | Undertake positive action when<br>recruiting at these grades.<br>Advertising and encouraging,<br>using straplines such as SNH<br>welcomes applicants from   |
| Gender                         |  |  |   |
| reassignment                   |  |  |   |
| Marriage and civil partnership |  |  |   |
| Pregnancy and maternity        |  |  |   |
| Race                           | The Scottish Census of 2011 shows that 4% of people are from visible minority ethnic groups. 96% of the population are recorded as white ethnic of whom 4% are classed non-British white. Polish make up 1.2% of the latter.   | Scottish Government<br>Evidence Finder (Scotland's<br>Population 2013 (Published<br>in The Registrar General's<br>Annual Review of<br>Demographic Trends)) | Plain English and images to make<br>the implementation of the project<br>as accessible as possible to those<br>with limited English language<br>skills or who do not note English<br>as their first language. |
|                                | 93% of people 3 years and over report that<br>they used only English at home. 98% of the<br>population 3 years and over reported that they<br>could speak, read, write or understand<br>English. Only 1.2% of people 3 years and   | Scotland's Census 2011<br>Statistical Bulletin Release<br>2A   |   |

|                    | over reported being unable to speak English<br>well and just 0.2% were unable to speak<br>English at all. |  |
|--------------------|---|--|
| Religion or belief |   |  |
| Sexual orientation |   |  |

Additional comments: The project team will liaise closely with HR colleagues to ensure outcomes of the project do not allow unlawful discrimination.

#### Stage 5. The significance of the potential impacts

Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the policy offers opportunities to promote equality and/or foster good relations.

| Protected characteristic       | Impacts   | Positive (+)<br>Negative (-)<br>Neutral (0) | High (H)<br>Medium (M)<br>Low (L) |
|--------------------------------|---|---|-----------------------------------|
| Age                            | From the research paper "Effects of Change and Change<br>Management on Employee Responses: An Overview of<br>Results from Multiple Studies " results indicated that the<br>favourable consequences of good change practices were<br>limited to younger workers, with older workers actually showing<br>declines in motivation levels under favourable change process<br>conditions. | -   | M                                 |
| Disability                     | This has the potential to impact positively for example as short<br>term career development opportunities for staff will be<br>advertised internally on the basis of current location rather than<br>relocation.  | +   | L                                 |
| Gender                         | There may be an impact regarding gender as this project has<br>the potential to affect the structure of the higher grades in SNH<br>where there is already a gender imbalance   | -   | M                                 |
| Gender reassignment            | Neutral   | 0   | L                                 |
| Marriage and civil partnership | Neutral   | 0   | L                                 |
| Pregnancy and maternity        | Neutral   | 0   | L                                 |

| Race               | Neutral | 0 | L |
|--------------------|---------|---|---|
| Religion or belief | Neutral | 0 | L |
| Sexual orientation | Neutral | 0 | L |

#### Stage 6. Action needed to fulfil the needs of the general equality duty

Please consider the results of your impact assessment, what mitigating or positive action do you recommend in order to fulfil the three needs of the general equality duty? This will involve considering whether the evidence indicates that there is likely to be a differential impact<sup>5</sup> on particular equality groups, and particularly whether this impact is disproportionately negative. Remember that it is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place single-sex provision where there is a need for it. It is both lawful and a requirement of the general equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

| Needs of the general equality duty                                | Mitigating or positive actions needed, recommended or planned for each protected characteristic. (Age, Disability, Gender, Race, Sexual orientation, Gender reassignment, Pregnancy and maternity, Religion or belief) |
|---|--|
| 1. Eliminate unlawful discrimination, victimisation or harassment | Ensure no unlawful discrimination takes place, through project implementation which is fit for purpose while considering potential equality impacts  |
| 2. Advancing equality of opportunity                              | As above.  |
| 3. Fostering good relations                                       | Communicate effectively to all employees and liaise, if required, with specialist groups and agencies (such as RNIB).  |

<sup>&</sup>lt;sup>5</sup> Suggests that a particular group has been affected differently by a policy, in either a positive, neutral or negative way.

### Stage 7. Taking account of the results of the assessment

Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:

- No major change your assessment demonstrates that the policy is robust. There is no potential for unlawful discrimination and you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review
- Adjust the policy this involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- Continue the policy (despite the potential for adverse impact) you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- Stop and remove the policy if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the policy altogether. If a policy leads to unlawful discrimination it should be removed or changed.

| Option selected                                | Justification   |
|--|---|
| No major change -<br>continue with the Project | Monitor throughout development of the project and implementation. |

# Stage 8. Summary of agreed actions resulting from your assessment

What action, by whom, will be undertaken as a result of the impact assessment.

| No. | Action   | Person responsible   | Timescale    |
|-----|--|--|--------------|
| 1.  | Travel to local offices<br>to ensure engagement<br>and contribution across<br>SNH regarding the<br>project                   | Jane Macdonald, Kath<br>Leys, Daniel Gotts and<br>Muriel Crout | Q1 - Q4 2015 |
| 2.  | Drop in sessions<br>arranged so that as<br>many employees as<br>possible have the<br>opportunity to engage<br>in the project | Jane Macdonald, Kath<br>Leys, Daniel Gotts and<br>Muriel Crout | Q1 - Q4 2015 |

| 3. | Different methods used<br>to communicate the<br>outcomes of the MPR<br>project   | Communications unit and<br>Program office   | Q4 2015 Q1 2016 |
|----|--|---|-----------------|
| 4. | The outcomes are<br>embedded across SNH<br>through changes to<br>structure, reallocation<br>of tasks, changes in<br>policy and procedure | SNH Management team<br>G Grade senior managers<br>Strategic managers<br>Portfolio managers<br>MPR project manager<br>Programme office | Q4 2015 onwards |
| 5. | Monitor and evaluate<br>the changes made   | G Grade senior managers<br>Strategic managers<br>Portfolio managers<br>MPR project manager  | Ongoing         |
| 6. | Other projects<br>implemented to<br>complement and build<br>on MPR   | SNH Management team<br>G Grade senior managers<br>Project teams   | Ongoing         |

## Stage 9. Monitoring implementation

Post implementation review – the lessons learnt log is utilised and the next staff survey will include questions to gauge the impact of MPR. The project itself is completed and other projects including the Workforce Planning Programme have grown (in part) out of the work undertaken by MPR.

Review date: 1 August 2019 Reviewer: Muriel Crout

#### Stage 10. Procurement

The public sector equality duty for procurement requires bodies to consider how they can further fulfil the needs of the general duty in how they procure goods and services both through the award criteria and contract conditions. This applies to thresholds which most, if not all, our procurement falls below. However, EHRC guidance encourages public bodies to adopt these principles to help meet our broader obligations in relation to procurement and equality.

Consequently, if your proposal involves any related procurement of goods, services or advice, you should now consider how best to reflect the results of your impact assessment in the procurement process.

| Award criteria at tender stage       | N/A |
|--------------------------------------|-----|
| How will you evaluate award criteria | N/A |
| Contract performance criteria        | N/A |

#### Stage 11. Authorisation

Please confirm that:

This Equality Impact Assessment has informed the development of this policy:

Yes 🛛 No 🗌

Opportunities to promote equality in respect of age, disability, sex, pregnancy and maternity, gender reassignment, sexual orientation, race and religion or belief have been considered, i.e.:

- Eliminating unlawful discrimination, harassment, victimisation;
- Advancing equality of opportunity;
- Fostering good relations

| Yes 🖂 | No | L |
|-------|----|---|
|       |    |   |

I am satisfied with the equality impact assessment that has been undertaken for the **Matching Priorities and Resources** project and give my authorisation for the results of this assessment to be published on the SNH website.

| Name:               | Jane Macdonald  |
|---------------------|-----------------|
| Position:           | Project Manager |
| Authorisation date: | 01/08/2016      |

Note: if this EqIA is associated with a policy that requires Director, Management Team or Board sign-off, you should arrange for the results of the assessment to accompany approval of the policy. This is to ensure that decision-makers are given sufficient information to enable them to pay due regard to equality when making their decision.

## Stage 12. Storing and publishing this EqIA

The regulations require that where an assessment has been made and the policy is implemented, the results of any assessment be published 'within a reasonable period' of the decision to apply the policy.

Please now publish this EqIA in eRDMS file B239231 and send the ID to the Equality and Diversity Team <u>diversity@snh.gov.uk</u> for quality assurance and publishing on the SNH website.