



EQUALITY IMPACT ASSESSMENT (EqIA)

Summary results of the EqIA

Title of policy/practice/process/service:

Dignity at Work Policy

Is the policy new (proposed), a revision to an existing policy or a review of current policy?

Revision to existing policy

Key findings from this assessment (or reason why an EqIA is not required):

The policy's aim is to prevent bullying, harassment, victimisation and discrimination in particular on grounds of a protected characteristic, and to create a culture in which everyone working for and with the SLAB is treated with dignity and respect. The policy therefore applies to all SLAB employees, board members, self-employed contractors, agency/casual workers, and volunteers/interns. The wide scope also applies given SLAB's duties under the Public Sector Equality Duty and if claims were to arise, to assist SLAB in establishing a 'reasonable steps' defence.

Summary of actions taken because of this assessment:

The existing SLAB policy concentrates on preventing bullying and harassment, preventing victimisation and discrimination will also be included.

The policy's aim is to prevent bullying, harassment, victimisation and discrimination in particular on grounds of a protected characteristic, and to create a culture in which everyone working for SLAB is treated with dignity and respect.

Committed to promoting an inclusive environment for neurodiversity in our organisation and ensuring employees feel comfortable discussing their neurodivergence.

Definition of harassment aligned to the statutory definition in Equality Act.

Examples of bullying and harassment behaviours will be added.

Clear guidelines on the process for making a complaint and support has been added.

The policy will also make clear what the procedure is should a third party be involved.

Ongoing actions beyond implementation include:

Ongoing monitoring

Lead person(s) for this assessment (job title and department only):

Head of People and Organisational Development, Corporate Services and Accounts

Senior responsible owner agreement that the policy has been fully assessed against the needs of the general duty (job title only):

Director of Corporate Services

Publication date (for completion by Communications):

12/12/2023

Document control		
Document control:		V0.4
Date policy live from:		1 December 2023
Review cycle:		Three years unless a change in law or practice and any results from equality monitoring.
Document change log		
Version/Author	Date	Comment
V0.1 Morton Fraser	4/2/2022	Release for internal SLAB review.
V0.2 Agata Soroka	July 2023	Further evidence gathered to explore promoting and fostering arms of the PSED and reviewed against further redraft of policy.
V0.3 Agata Soroka	October 2023	To reflect findings of staff consultation.
V0.4 Kirsty Lockhart	November 2023	To update following changes made to policy because of staff and union feedback during consultation.
V0.5 Agata Sorka	November 2023	To update following final review meeting feedback.

Step 1 - Framing the planned change

Discussing step 1 and step 2 with the Policy Officer (Equalities) at an early stage will help identify appropriate evidence. This may include support from the wider Policy and Development team.

1.1 Briefly describe the aims, objectives and purpose of the policy/practice/process/service. You can use the information in your project specification, business case etc.

The aims of the Dignity at Work Policy are to:

- ensure the dignity at work of all our employees;
- respect and value differences;
- make full use of the talents of all the workforce;
- prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours;
- demonstrate our commitment to equal opportunities for all;
- be open and helpful in our communications;
- encourage our employees to develop positive behaviour towards one another, and all those with whom they have contact in their work.

The Dignity at Work Policy is of particular relevance to our obligations to meet the PSED. In particular the policy should help SLAB to meet its general duty to have due regard to the need to:

- eliminate discrimination, victimisation, harassment, bullying or other unlawful conduct that is prohibited under the Equality Act 2010;
- advance equality of opportunity between people who share a characteristic and those who do not;
- develop good relations between people who share a relevant protected characteristic and those who do not.

1.2 Why is the change required? Legislative, routine review etc.

The Dignity at Work Policy is being reviewed to ensure that the policy and any updates remain fit for purpose in terms of current employment and equality law, current guidance as well as and good practice from an HR and equalities perspective. The

existing SLAB policy concentrates on bullying and harassment. Sections on victimisation and discrimination will be added. There will be clear guidelines on the process for making a complaint and support.

1.3 Who is affected by this policy/practice/process/service? *Be clear about who the ‘customer’ is.*

This policy applies to all SLAB employees, board members, self-employed contractors, agency/casual workers, and volunteers/interns.

1.4 Policy/practice/process/service implementation date? *Project end date, date new legislation will take effect.*

01/12/2023

1.5 What other SLAB policies or projects may be linked to or affected by changes to this policy/practice/process/service?

The EqlA for related policies might help you understand potential impacts, and/or your findings might be relevant to share.

- Disciplinary policy
- Equality & Diversity policy
- Grievance policy
- Whistleblowing policy.

Step 2: Consider the available evidence and data relevant to your policy/practice/process/service

The information you gather in this section will:

- help you to understand the importance of your policy/practice/process/service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.1 What information is available about the experience of each equality group in relation to this policy/practice/process/service?

Stay focused on the topic and scope of your policy/practice/process/service. Does the policy/practice/process/service relate to an area where there are already known inequalities? Refer to the EqlA guidance for sources of evidence.

Remember, this step in the EqlA process is NOT about the impact your policy has on equality groups and what we need to do to mitigate those. That assessment is done under Step 4.

Note: If you proceed to a full EqlA you should continue to add to this section as you develop the policy/practice/process/service, come across new evidence and/or undertake a consultation.

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
All protected groups	(1) 2022 SLAB Staff Survey (2) Working Lives Scotland 2023: survey briefing, CIPD, 2023	According to the 2022 SLAB Staff Survey briefing (1): <ul style="list-style-type: none">• Within all the 297 SLAB employees surveyed, 12 (4%) reported bullying and harassment in the past 12 months, with 4% reporting they had experienced discrimination at work, comparing favourably with the CSPS median, and with Justice Agencies and Funding Agencies.

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<ul style="list-style-type: none"> • Of those saying that they had been bullied, two thirds (66%) said that they did not report it, which is higher than the equivalent figures for the CSPA (61%), Justice (61%) and Funding Agencies (57%). • The main reasons for not reporting bullying included job safety (4 cases), not to be seen as a trouble maker (3 cases) and not thinking corrective action would be taken (6 cases). • Eight people indicated that the work culture at SLAB allows bullying and harassment behaviour to continue. • A qualitative response received states that <i>"When it was reported in the past nothing was done about it, in fact, one of the bullies was in a way promoted and nothing was done to him. I was sent to counselling and training on how to deal with difficult people."</i> <p>The 2022 survey does not suggest any trends or concerns related to harassment, bullying, discrimination or victimisation in the context of specific protected characteristics. The number of employees declaring concerns in the above responses, as well as the number of employees who reported bullying, harassment or discrimination to HR is too low to include a breakdown of the protected characteristics of this group within this impact assessment.</p> <p>A 2023 CIPD Working Lives Scotland survey briefing shows that 6% of all employees say they experienced discriminatory behaviour, with the vast majority (72%) of these saying it was not resolved. (2)</p>

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Age	<p>(1) Annual Report and Accounts 2022-2023</p> <p>(2) Ageism: What's the harm?, Centre for Ageing Better, 2023</p> <p>(3) Attitudes to age in Britain, DWP, 2010-2011</p>	<p>The mean employee age is now 45 years, compared to 46 in the previous year. Our employees are clustered around the middle age ranges with fewer employees aged <=24 years and 65+ years (both <5%). Around a third of our employees are aged 45-54 years (30- 35%). Proportionally, our age demographic has several similarities to the 2019 Scottish population in employment: the main difference is across the lower age ranges where <5% of our staff are aged <=24 years and 10-15% are aged 25-34 years, compared to the 2019 Scottish population in employment, for which the figures are 11.9% aged <=24 years and 23% aged 25-34 years. The percentage of our staff aged 45-54, in contrast, is higher than that in the 2019 Scotland population in employment (30-35%, compared to 20-25%). (1)</p> <p>A 2023 publication by Centre for Ageing Better reports that older workers are frequently subject to stereotypes related to their motivation, cognitive abilities, and usage of technology. It also states that 1 in 5 employers recognise that age discrimination exists within their organisation. (2)</p> <p>However, both younger and older workers may experience harassment and discrimination related to their age. A 2011 DWP research found that:</p> <ul style="list-style-type: none"> • one-third of respondents had experienced age discrimination in the past year, • younger respondents aged under 25 were at least twice as likely as other age groups to have experienced age prejudice, • experiences of age discrimination were also affected by factors such as gender, for example the chances of a man experiencing age discrimination are about 8% lower when compared a woman. (3)

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Disability	<p>(1) Annual Report and Accounts 2022-2023</p> <p>(2) Scotland's Labour Market: People, Places and Regions - Protected Characteristics. Statistics from the Annual Population Survey 2021</p> <p>(3) Disability inclusion at work: the many not the few, LSE, 2022</p> <p>(4) Disability and “hidden” impairments in the workplace, TUC Wales, 2018</p> <p>(5) Neurodiversity at work, CIPD, 2018</p>	<p>15-20% of employees who completed their equality record declared a disability or long-term health condition. This level remains higher than the 2019 Scottish population in employment figure of 13.7%, but lower than the 25.9% of people with a disability in the general population. (1)</p> <p>Disabled employees are particularly likely to be excluded from employment, as according to Scottish Government statistics in 2021 in Scotland the employment rate for disabled people aged 16 to 64 was estimated at 49.6%; significantly lower than the rate for non-disabled people (80.8%). (2)</p> <p>A 2022 LSE publication referring to earlier research states that biases stemming from prejudice or inaccurate information are central to workplace disadvantages associated with disability. Such biases may be expressed by underestimating the productivity and capacity of disabled employees and overestimating the cost of reasonable adjustments. (3)</p> <p>A 2018 Wales TUC report on disability and “hidden” impairments in the workplace found that:</p> <ul style="list-style-type: none"> • 24% of disabled respondents said they felt disability was treated negatively in their workplace • just 6% of non-disabled respondents said they felt disability was treated negatively in their workplace, highlighting a lack of awareness of the issues disabled people face

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<ul style="list-style-type: none"> • Respondents described negative and often discriminatory attitudes and behaviour towards disabled people: insulting or inappropriate questions or comments and excluding or isolating disabled workers due to their disability. (4) <p>A 2018 CIPD publication on neurodiversity in the workplace states that there is a risk that uninformed co-workers may see a neurodiverse colleague who is having difficulty with one aspect of their role as lazy or inept, causing neurodivergent individuals to hide their diagnosis, or in extreme cases leading to bullying or complaints. (5)</p>
Race	<p>(1) Annual Report and Accounts 2022-2023</p> <p>(2) Racism Ruins Lives: An analysis of the 2016-2017 Trade Union Congress Racism at Work Survey, TUC, 2017</p> <p>(3) Racism at Work, Pearn Kandola, 2021</p>	<p>Our data tells us that our employee ethnic origin demographic is:</p> <ul style="list-style-type: none"> • 85-90% White Scottish and other British • <5% White minority • <5% minority ethnic groups • 5-10% selected prefer not to say. <p>Our employee demographic is broadly comparable to the 2019 Scottish population, except in the ‘White - minority’ group, which is underrepresented compared to the Scottish in work population. Since the 2021-2022 report, ‘white - minority’ has moved from 5-10% of our staff complement to <5%. (1)</p> <p>Findings of 2016-2017 TUC survey on racism at work show that racism in the workplace still plays a major role in the experience of ethnic minority workers:</p>

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<ul style="list-style-type: none"> • Over 70% of Asian and Black workers reported that they had experienced racial harassment at work in the last five years. • Of those who responded, 46% of people from Black, Asian and Mixed Heritage background, and 32% of non-White other participants reported that they had been subjected to ‘verbal abuse and racist jokes’, with racist remarks the most common form of racial harassment. • More than 40% of workers who reported a racist incident to their employer said that their complaint was either ignored or that they themselves had subsequently been identified as ‘troublemakers’. • Of respondents who raised a complaint, 1 in 10 said that they were subsequently disciplined and/or forced out of their job because of doing so. • Nearly half of all respondents said that racism had negatively affected their ability to do their job. (2) <p>More recent research carried out among Asian, Black and White UK workers by Pearn Kandola in 2021 found that:</p> <ul style="list-style-type: none"> • Black respondents were 15.1 times more likely to experience racism in the workplace than White respondents (11.1 times in 2018). • Black respondents were 1.9 times more likely to experience racism in the workplace than Asian respondents (2.3 times in 2018). • Asian respondents were 8.1 times more likely to experience racism in the workplace than White respondents (4.9 times in 2018). (3)

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Sex	<p>(1) Annual Report and Accounts 2022-2023</p> <p>(2) Sexism is a Waste, Zero Tolerance, 2017</p> <p>(3) New TUC poll: 2 in 3 young women have experienced sexual harassment, bullying or verbal abuse at work, TUC, 2023</p> <p>(4) Turning the tables: ending sexual harassment at work, EHRC, 2018</p> <p>(5) Sexual harassment and harassment at work, EHRC, 2020</p> <p>(6) Enough Is Enough: Tackling Workplace Sexual Harassment in Scotland, Engender, 2022</p>	<p>We have a 65-70% female and 30-35% male breakdown. The 2019 population data shows that in the general population 52% were female and 48% were male and of those in employment, 48.5% were female and 51.5% were male. (1)</p> <p>2017 research carried by Zero Tolerance found that the following percentage of respondents witnessed the sexist behaviours below:</p> <ul style="list-style-type: none"> • Witnessing a colleague ask a woman to take the minutes of a meeting despite them being more senior - 67% • Wolf whistling at work in jest - 70% • Witnessing colleagues talk about whether a woman might be right for a promotion given her caring responsibilities - 82% • Commenting on someone's appearance - 51% • Overhearing a colleague remark 'ignore her, maybe it's that time of the month' - 90% • Witnessing colleagues grouped and referred to as the 'ladies' team' - 70% • A manager seeking a second opinion from a male colleague, having received an answer from a female colleague - 66% <p>Moreover, over 70% of respondents reported witnessing or experiencing sexual harassment, and 10% reported witnessing or experiencing violence of a physical nature (rape) or mental violence or of a mental nature (patterns of bullying, degradation, or mental cruelty). (2)</p> <p>A 2023 TUC poll of 1010 women found that:</p>

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<ul style="list-style-type: none"> • 1 in 5 women say they have experienced harassment at work - rising to almost 2 in 3 women aged 25 to 34. • In 39% of the most recent incidents, the perpetrator of the sexual harassment, bullying or verbal abuse was a third party rather than another member of staff; younger women are particularly at risk of this type of harassment, as half of women (52%) aged 18 to 34 say they have experienced harassment from a third party at work. • Less than 30% of women who say they experienced sexual harassment at work told their employer about what was happening - and only two in five (44%) of those being bullied and half (50%) experiencing verbal abuse report it; of those who didn't report it, some felt they would not be believed or taken seriously (39%), while others thought reporting it would impact negatively on their relationships at work (37%) or on their career prospects (25%) • 45% of the women declaring previous experience of sexual harassment at work say that it has had a detrimental impact on their mental health. 25% say they avoided certain work situations, like meetings, courses, locations, and shifts, to avoid the perpetrator. 27% say they wanted to leave their job but couldn't, and 18% left their job because of this treatment. (3) <p>A 2018 EHRC publication on ending sexual harassment at work states that:</p> <ul style="list-style-type: none"> • Nearly all the people who had been sexually harassed were women. While sexual harassment can be perpetrated by both men and women, we know that women are most often the targets. • The most common perpetrator of harassment was a senior colleague.

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<ul style="list-style-type: none"> • Just under 25% reported being harassed by customers, clients or service users. Respondents reported that this type of sexual harassment was dealt with particularly poorly. A common theme was a lack of management support, with sexual harassment and assault viewed by some employers as a ‘normal’ part of the job. Several respondents in this group felt that they had to accept it to keep their job. It should be noted that many of respondents in this category were in the hospitality sector, but other sectors were represented as well. • Around half our respondents hadn’t reported their experience of harassment to anyone in the workplace, due to a fear of victimisation or a view that the issue would not be taken seriously, and the alleged perpetrator would be protected, and due to lack of appropriate reporting procedures. • Many respondents described negative consequences of reporting, such as being threatened with a damage to their career, being disciplined or losing their job, being blamed for the incident, being moved to a different department while the perpetrator kept their role, and impact on mental and physical health. (4) <p>Guidance issued by the EHRC recommends that employers have different policies to deal with sexual harassment and harassment related to protected characteristics or have one policy which clearly distinguishes between the different forms of harassment. The EHRC guidance also makes several recommendations on good practice in developing an anti-harassment policy, such as addressing third party harassment and covering all areas of employer’s organisation (full list in para 5.6 of the guidance). (5)</p>

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Gender Reassignment	<p>(1) Annual Report and Accounts 2022-2023</p> <p>(2) LGBT in Britain: Trans Report, Stonewall, 2018</p> <p>(3) LGBT In Britain: Work Report, Stonewall, 2018</p> <p>(4) Sexual harassment of LGBT people in the workplace, TUC, 2019)</p>	<p>We monitor data in relation to gender reassignment but do not publish it due to the risk of disclosure and identifying individuals. (1)</p> <p>The 2018 Stonewall LGBT in Britain: Trans Report and Work Report state that:</p> <ul style="list-style-type: none"> • Two in five trans people (40%) adjust the way they dress because they fear discrimination or harassment. This number increases significantly to half of non-binary people (52%) • One in eight trans employees (12%) have been physically attacked by colleagues or customers in the last year • Half of trans and non-binary people (51% and 50% respectively) have hidden or disguised the fact that they are LGBT at work because they were afraid of discrimination • Trans staff are also at risk of abuse from customers, clients, and service users: 35% of trans staff have been the target of negative comments or conduct from customers or clients at work in the last year because they are trans. • One in five trans people (21%) wouldn't report transphobic bullying in the workplace. <p>The Reports recommends that employers develop clear zero tolerance policies on transphobic bullying, discrimination, and harassment with clear sanctions for staff and customers, as well as routes for reporting harassment and bullying, supported by all-staff training. (2)(3)</p>

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		A 2019 TUC report on sexual harassment of LGBT people in the workplace revealed that nearly 7 out of 10 (68%) LGBT people who responded had been sexually harassed at work. (4)
Sexual orientation	<p>(1) Annual Report and Accounts 2022-2023</p> <p>(2) LGBT In Britain: Work Report, Stonewall, 2018</p> <p>(3) Sexual harassment of LGBT people in the workplace, TUC, 2019</p>	<p>Less than 5% of employees identify as lesbian, gay, bisexual, or other/unsure. LGBT and 'Other' representation appear comparable to the 2019 general Scottish population (2.9%) and the population of people who are in employment (3.2%). Whilst 10-15% of staff continue to answer 'prefer not to say' the specific percentage has decreased slightly since last year. (1)</p> <p>The 2018 Stonewall LGBT in Britain: Work Report states that:</p> <ul style="list-style-type: none"> • Almost one in five LGBT staff (18%), one in four (26%) disabled LGBT staff and one in three (33%) trans staff have been the target of negative comments or conduct from work colleagues in the last year because they are LGBT • One in ten black, Asian and minority ethnic LGBT staff (10%) have been physically attacked at work in the last year because of their sexual orientation and/or gender identity, compared to three% of white LGBT staff • One in eight black, Asian and minority ethnic LGBT employees (12%) have lost a job in the last year because of being LGBT, compared to 4% of white LGBT staff • More than a third of LGBT staff (35%) have hidden or disguised that they are LGBT at work in the last year because they were afraid of discrimination • One in eight lesbian, gay and bi people (12%) wouldn't feel confident reporting any homophobic or biphobic bullying to their employer, and one in five trans people (21%) wouldn't report transphobic bullying in the workplace

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<ul style="list-style-type: none"> • A third of LGBT staff (32%) witnessed negative comments or conduct directed towards another colleague perceived to be LGBT, within the last year • LGBT staff are also at risk of abuse from customers, clients, and service users: 13% LGBT staff have been the target of negative comments or conduct from customers or clients at work in the last year because they are LGBT. • One in eight lesbian, gay, and bi people (12%) wouldn't feel confident reporting homophobic or biphobic bullying to their employer, and this number increases among younger lesbian, gay and bi people aged 18 to 24 to 22%. <p>The Report recommends that employers develop clear zero tolerance policies on homophobic and biphobic bullying, discrimination, and harassment with clear sanctions for staff and customers, as well as routes for reporting harassment and bullying, supported by all-staff training. (2)</p> <p>A 2019 TUC report on sexual harassment of LGBT people in the workplace revealed that nearly 7 out of 10 (68%) of LGBT people who responded had been sexually harassed at work. (3)</p>
Religion or Belief	<p>(1) Annual Report and Accounts 2022-2023</p> <p>(2) Religion and belief, CIPD, accessed 19 July 2023</p>	<p>The number of employees identifying as Christian (30-35%) is lower than what was reported for the 2019 Scottish population (42.5%) but broadly comparable to those in employment (36.4%). The percentage of employees declaring no religion (50-55%) is in line with the 2019 Scottish population (53.7%) but significantly lower than those in employment (60%). This is the same position as previous years. The number of employees identifying with other religions (collating Buddhist, Hindu, Muslim, and others, for example Jewish) is less than 5%, in line</p>

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	<p>(3) Racism Ruins Lives: An analysis of the 2016-2017 Trade Union Congress Racism at Work Survey, TUC, 2017</p> <p>(4) The Social Mobility Challenges Faced by Young Muslims, Social Mobility Commission, 2017</p>	<p>with both the 2019 national profile and for those in employment (3.1%). Our ‘prefer not to say’ figure remains relatively high at 10-15%, though again, this figure has reduced slightly since we last reported. (1)</p> <p>In their viewpoint on religion and belief, CIPD refers to 2017 research findings stating that 3% of workers say they are discriminated against because of their religion or beliefs, and a similar proportion report having witnessed colleagues being discriminated against on this basis. (2)</p> <p>Findings of 2016-2017 TUC survey on racism at work, while focused on race, also draw attention to Islamophobia and antisemitism in the workplace and the way in which different religious groups are represented as constituting a distinct racial group, as the report highlights the many encounters of Islamophobia and antisemitism reported through the TUC’s racism at work survey. (3)</p> <p>A 2017 report by the Social Mobility Commission on the social mobility challenges faced by young Muslims found that the 'othering' of Muslims by employers and colleagues through Islamophobia, racism, discrimination, and harassment in the labour market can increase the disadvantage experienced by young Muslims, and that racism and discrimination in the workplace is limiting aspirations and preventing young Muslims from fulfilling their potential. (4)</p>
Pregnancy or maternity	(1) SLAB Annual Report and Accounts 2022-2023	In 2022-23, 100% of maternity leavers returned to work. Of these, 60% (20% more than the year prior) requested a variation to their contractual hours on return to

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	<p>(2) Sexual harassment and harassment at work, EHRC, 2020</p> <p>(3) Sexual harassment and harassment at work, EHRC, 2020</p>	<p>work and all were approved on a permanent basis. SLAB does not gather information on absence rates among this protected characteristic group. (1)</p> <p>EHRC guidance on sexual harassment and harassment at work refers to pregnancy and maternity discrimination research findings where one in five mothers said they had experienced harassment or negative comments related to pregnancy or flexible working at work. (2)</p> <p>Unlike other forms of discrimination, pregnancy and maternity and marriage and civil partnership are not protected under the harassment provisions. However, harassing somebody because of pregnancy or maternity would be harassment related to sex. (3)</p>
Marriage/civil partnership	(1) Sexual harassment and harassment at work, EHRC, 2020	Unlike other forms of discrimination, pregnancy and maternity, and marriage and civil partnership, are not protected under the harassment provisions. (1)
Care Experienced (corporate parenting duty)	<p>(1) Staff demographics</p> <p>(2) Corporate parenting literature review</p>	<p>5-10% of all staff members declare they are care-experienced, 80-85% are not and 10-15% prefer not to say. (1)</p> <p>No evidence was found that indicates that there is a direct impact of this policy on this protected characteristic, however, being care experienced is linked to higher levels of mental ill health and poorer educational outcomes, as well as a greater likelihood of being involved in the criminal justice system or experiencing homelessness. (2)</p>

2.2 Using the information above and your knowledge of the policy/practice/process/service, summarise your overall assessment of how important and relevant the policy/practice/process/service is likely to be for equality groups.

Based on the information gathered above, it is likely that the policy impacts on all protected characteristics (PC). Despite the apparent low numbers in relation to some PCs, the risk of discrimination and harassment related to this PC is not insignificant given the impact on the individual if it occurs. Any other potential impacts should be investigated during the consultation process.

2.3 Outcome of step 2 and next steps. Complete the table below to inform the next stage of the EqIA process.

Consult with the project group and/or Policy Officer (Equalities) on completing this section.

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality or our corporate parenting duties	N	Proceed to Step 5: agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups and/or our corporate parenting duties	Y	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all of the equality groups and/or our corporate parenting duties	N	Proceed to Step 3: complete full EqIA

Step 3 - stakeholder involvement and consultation

This step will help you to address any gaps in evidence identified in Step 2. Speaking to people who will be affected by your policy/practice/process/service can help clarify the impact it will have on different equality groups.

Remember that sufficient evidence is required for you to show ‘due regard’ to the likely or actual impact of your policy/practice/process/service on equality groups. An inadequate analysis in an assessment may mean failure to meet the general duty.

The Policy and Development team can help to identify appropriate ways to engage with external groups or to undertake research to fill evidence gaps.

3.1 Do you/did you have any consultation or involvement planned for this policy/practice/process service?

Yes

3.2 List all the stakeholder groups that you will talk to about this policy/practice/process/service.

Consultations to be carried out with SLAB leadership team, all employees, and the Union.

3.3 What did you learn from the consultation/involvement? Remember to record relevant actions in the assessment action log.

Union and Staff Consultation - August 2023:

- Only 4% of respondents felt the policy would have different impact on different groups of people based on protected characteristics.
- One respondent felt there should be further information on neurodiversity.
- One respondent felt all employees, not just managers, should complete understanding unconscious bias training.

Step 4 - Impact on equality groups and steps to address these

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? *How will this be mitigated?*
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? *How can this be achieved?*
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? *How can this be achieved?*

4.1 Does the policy/practice/process/service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

In the tables below, record the impact the policy/practice/process/service might have on each equality characteristic, as it is planned or as it operates, and describe what changes in policy/practice process/service or actions will be required to mitigate that impact. Copy any actions across to the project action log.

Age	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		<p>Evidence suggests that ageism is a common workplace issue.</p> <p>To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and</p>

				<p>embeds diversity and bias training into decision making process related to the policy.</p> <p>To ensure that this positive impact is maximised, as managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential for developing good relations	X			<p>The measures implemented in the policy (as above) intend to support good relations between those who share the protected characteristics of age and those who do not.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential to advance equality of opportunity	X			<p>The measures implemented in the policy (as above) intend to build a positive working environment for everyone, regardless of whether they share the protected characteristics of age.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>

Sex	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	

potential for discrimination	X	X	<p>The evidence suggests that sexism, including sexual harassment, affects a significant proportion of UK workforce, particularly female employees.</p> <p>To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and embeds diversity and bias training into decision making process related to the policy.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p> <p>While the policy does refer to sexual harassment and provides an example of harassment of sexual nature, it is recommended that the distinction between sexual harassment and harassment related to protected characteristics is made clearer (para 5.4 of EHRC guidance).</p>
potential for developing good relations	X	X	<p>The measures implemented in the policy (as above) intend to support good relations between those who share the protected characteristic of sex and those who do not.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>

potential to advance equality of opportunity	X			<p>The measures implemented in the policy (as above) intend to build a positive working environment for everyone, regardless of whether they share the protected characteristic of sex.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
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Disability	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		<p>The evidence suggests that bias and negative attitudes towards disabled and neurodivergent employees are present in many workplaces.</p> <p>To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and embeds diversity and bias training into decision making process related to the policy.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias. To further support those whose specific</p>

				needs arise from neurodiversity, a dedicated policy on neurodiversity is to be developed in due course.
potential for developing good relations	X			<p>The measures implemented in the policy (as above) intend to support good relations between those who share the protected characteristic of disability and those who do not.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential to advance equality of opportunity	X			<p>The measures implemented in the policy (as above) intend to build a positive working environment for everyone, regardless of whether they share the protected characteristic of disability.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>

Gender reassignment	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		The evidence suggests that bias, negative attitudes, and abusive behaviour towards transgender persons, including harassment and sexual harassment, affect many UK workers in this group.

				<p>To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and embeds diversity and bias training into decision making process related to the policy.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential for developing good relations	X			<p>The measures implemented in the policy (as above) intend to support good relations between those who share the protected characteristic of gender reassignment and those who do not.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential to advance equality of opportunity	X			<p>The measures implemented in the policy (as above) intend to build a positive working environment for everyone, regardless of whether they share the protected characteristic of gender reassignment.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>

Race	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		<p>The evidence suggests that bias, negative attitudes, and abusive behaviour towards non-White persons affect many UK workers in this group.</p> <p>To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and embeds diversity and bias training into decision making process related to the policy.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential for developing good relations	X			<p>The measures implemented in the policy (as above) intend to support good relations between those who share the protected characteristic of race and those who do not.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>

potential to advance equality of opportunity	X			<p>The measures implemented in the policy (as above) intend to build a positive working environment for everyone, regardless of whether they share the protected characteristic of race.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
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Religion or Belief	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		<p>The evidence suggests that bias and negative attitudes towards employees declaring a particular religion are present in UK workplaces.</p> <p>To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and embeds diversity and bias training into decision making process related to the policy.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by</p>

				this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.
potential for developing good relations	X			<p>The measures implemented in the policy (as above) intend to support good relations between those who share the protected characteristic of religion and those who do not.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential to advance equality of opportunity	X			<p>The measures implemented in the policy (as above) intend to build a positive working environment for everyone, regardless of whether they share the protected characteristic of religion.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees, and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>

Sexual Orientation	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X	X		The evidence suggests that bias, negative attitudes, and abusive behaviour towards LGB persons, including harassment and sexual harassment affect many UK workers in this group.

				To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and embeds diversity and bias training into decision making process related to the policy.
potential for developing good relations	X			<p>The measures implemented in the policy (as above) intend to support good relations between those who share the protected characteristic of sexual orientation and those who do not.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees, and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>
potential to advance equality of opportunity	X			<p>The measures implemented in the policy (as above) intend to build a positive working environment for everyone, regardless of whether they share the protected characteristic of sexual orientation.</p> <p>To ensure that this positive impact is maximised, all managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given training on this policy, diversity awareness, and understanding unconscious bias.</p>

Pregnancy & Maternity	Place ‘X’ in the relevant box(es)	Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your
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	Positive impacts	Negative impacts	No impact	justification to not make changes despite the potential for adverse impact.
potential for discrimination	X	X		<p>The evidence suggests that bias, negative attitudes towards pregnant persons affect many UK workers in this group.</p> <p>To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and mitigate their negative impact, the policy implements a zero-tolerance approach extended to third parties, offers the employees affected a choice of channels for reporting (formal and informal, through a manager or a “confidential helper”), and embeds diversity and bias training into decision making process related to the policy.</p>
potential for developing good relations	X	X		As above.
potential to advance equality of opportunity	X	X		As above.

Marriage & Civil Partnership	Place ‘X’ in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	
potential for developing good relations			X	
potential to advance equality of opportunity			X	

Care experienced young people	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			The positive impact on those with mental health conditions will translate to the positive impact on care experienced employees.
potential for developing good relations	X			As above.
potential to advance equality of opportunity	X			As above.

4.2 Describe how the assessment so far might affect other areas of this policy/practice/process/service and/or project timeline?

We will consult with all staff and the Union and seek views on the refreshed policy before implementation, making clear the purpose of the refresh review. In addition, SLAB, as part of a new dispute resolution process proposed with its People Strategy, will be required to conduct a fuller review of this policy along with others (grievance, disciplinary).

4.3 Having considered the potential or actual impacts of your policy/practice/process/service on equality groups, you should now record the outcome of this assessment below.

Choose from one of the following (mark with an X or delete as appropriate):

Please select (X)	Implications for the policy/practice/process/service
	<p>No major change Your assessment demonstrates that the policy/practice/process/service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
X	<p>Adjust the policy/practice/process/service You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy/practice/process/service when implemented.</p>
	<p>Continue the policy/practice/process/service with adverse impact The policy/practice/process/service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.</p>
	<p>Stop and remove the policy/practice/process/service The policy/practice/process/service will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step 5 - Discuss and review the assessment with decision makers and governance structures

You must discuss the findings of this assessment with senior decision makers during the lifetime of the project/review and before you finalise the assessment. Relevant groups include, but are not limited to, a Project Board, Executive Team or Board members. EqIA should be on every project board agenda therefore only note dates where key decisions have been made (for example draft EqIA sign off, discussion about consultation response).

5.1 Record details of the groups you report to about this policy/practice/process/service and impact assessment. Include the date you presented progress to each group and an extract from the minutes to reflect the discussion.

- From January 2022 - Regular reviews and updates to the EqIA between Policy staff and People & OD colleagues, with input from Morton Fraser.
- August 2023 - Consultation with Employees and our recognised Trade Union.
- October and November 2023 - Following consultation with employees and our recognised Trade Union, changes made to the policy and EqIA.

Step 6 - Post-implementation actions and monitoring impact

There may be further actions or changes planned after the policy/practice/process/service is implemented and this assessment is signed off. It is important to continue to monitor the impact of your policy/practice/process/service on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

6.1 Record any ongoing actions below.

This can be copied from the project action log or elsewhere in this assessment and should include timescales and person/team responsible. If there are no outstanding items please make this clear.

- Monitor any allegations made by each of the protected characteristics to help us form any better conclusion in terms of equality (People & OD - ongoing)
- All employees will be alerted to this refreshed policy
- All employees who may need to investigate any allegation will be given training as required on anti-bullying and harassment, understanding unconscious bias and diversity awareness (People & OD from December 2023)
- Understanding unconscious bias training will be mandatory for all employees (People & OD from December 2023).

6.2 Note here how you intend to monitor the impact of this policy/practice/process/service on equality groups. *In the table below you should:*

- *list the relevant measures,*
- *identify who or which team is responsible for implementing or monitoring any changes,*
- *identify where the measure will be reported to ensure any issues can be acted on as appropriate.*

Measure	Lead department/ individual	Reporting (where/ frequency)
Allegations disaggregated by protected characteristics.	People & OD with policy support for analysis.	Annually as part of our regulatory reporting.
Staff survey	People & OD with policy support for analysis.	Every two years, to project board and Executive Team.

6.3 EqlA review date.

This EqlA should be reviewed as part of the post-implementation review of the policy/practice/process/service. The date should not exceed three years from the policy/practice/process/service implementation date.

01/12/2026

Step 7 - Assessment sign off and approval

Once final consultation has been undertaken with Corporate Policy Officer (Equalities), all equality impact assessments must be signed off by the relevant Director or Senior Responsible Owner (SRO), even where an EqlA is not required. The Chief Executive must approve all equality impact assessments. Note the relevant dates here:

Director/SRO sign off: 11/12/2023

Chief Executive approval: 11/12/2023

All full equality impact assessments must be published on SLAB's website as early as possible after the decision is made to implement the policy, practice, process, or service.