

# Summary results of the EqIA

# Title of policy/practice/service:

Learning and Development Policy.

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

Revision of existing policy.

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

The essence of the policy development is to further our equalities outcomes and support the diverse needs of our employees.

All protected characteristics are potentially of relevance. However, those most likely to be impacted by the policy are age, disability, sex, pregnancy/maternity, religion/belief and race.

# Summary of actions taken because of this assessment:

We aim to promote an inclusive environment where we consider neurodiversity in our practices and work to remove barriers for all protected characteristics.

We will consider how employees learn best, and we will review and evaluate our L&D practices to ensure accessibility.

The new L&D policy will be presented in a visually inclusive and engaging format. The policy will also ensure that the language is inclusive.

A Neurodiversity policy will be developed in due course.

# Ongoing actions beyond implementation include:

Ongoing monitoring.

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

People Consultant, People and Organisational Development.

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

Head of People and Organisational Development.

# Publication date (for completion by Communications):

15/05/2025.

# **Step 1: Framing the planned change**

# 1.1. Briefly describe the aims, objectives and purpose of the policy/process/service.

Learning and Development (L&D) is a key driver of employee engagement and business performance. Having high performing employees with the right skill set is critical to organisational success.

Through this improved L&D policy, SLAB will cultivate a learning culture where employees can learn and grow in an efficient and cost-effective way. Employees will be supported to continuously develop within their roles, and this will empower employees to take on new challenges and develop their skillsets. This will have a positive and direct impact on SLAB's ability to achieve its strategic objectives and adapt to future challenges.

Additionally, the improvements to the L&D policy will be key in SLAB attracting and retaining new talent.

# 1.2. Why is the change required?

Review of policy/process/service/practice.

This is a review of the L&D Policy to ensure that the policy remains fit for purpose in terms of current employment and equality law, and current guidance.

# 1.3. Who is affected by this policy/practice/process/service?

This policy applies to all SLAB employees.

# 1.4. Policy/practice/process/service implementation date.

19/05/2025

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

SLAB Performance Policy, SLAB Performance Framework, Travel & Subsistence, Neurodiversity Policy (to be completed), Probationary procedure (to be completed), Travel & Expenses, Purchasing, Redeployment Procedure.

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

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

# General information about the policy/practice

According to the 2023 Staff survey, within all the 393 SLAB employees surveyed:

- 77% of respondents indicated that they could access the right learning and development opportunities when needed (this is above the CSPS 2022 UK benchmark of 66%)
- 41% of respondents observed that there are opportunities to develop their career within SLAB (his is below the CSPS 2022 UK benchmark of 52%).1

# Age

# **Statistics**

#### SLAB's data

A higher proportion of respondents (60% compared to 41% on average) aged 18-34 agreed with the statement that there are opportunities to develop their career in SLAB.<sup>2</sup>

SLAB 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%) and our next largest age group is 35-44 (25-30%).<sup>3</sup>

# Data relevant to the policy

There is a risk that assumptions can be made in relation to training because of age. ACAS points out that employers must not:

- deny an employee training or development because of their age
- allow any bias, stereotypical thinking or assumptions about age to creep into decisions about who gets trained
- make assumptions about an employee's needs or ambitions based on their age, length of
  experience in a job, or length of time with the employer, or assume there is more value in training
  younger staff and no or little value in training older employees
- focus training for older workers only on their current role, or overlook older workers for opportunities for overall development, work experience, shadowing in other roles, or to move into a new or different role.
- deny training to young employees because they do not have enough experience or are in low-paid roles.<sup>4</sup>

<sup>&</sup>lt;sup>1</sup> 2023 Staff Survey (internal information)

<sup>&</sup>lt;sup>2</sup> 2023 Staff Survey (internal information)

<sup>&</sup>lt;sup>3</sup> 2023-24 SLAB Annual Report & Accounts

<sup>&</sup>lt;sup>4</sup> ACAS, Age discrimination: key points for the workplace

# Evidence on different age categories

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.<sup>5</sup>

A Getting Started Guide by Centre for Ageing Better states workers aged over 50 are less likely than any other age group to receive training.<sup>6</sup>

According to a 2021 ONS Census those in their early 50s are generally more likely to want to upskill than any other age group.<sup>7</sup>

A 2023 survey from Cypher Learning on L&D Insights for the Modern Workforce stated that from those surveyed 43% said their company's insufficient workplace training is holding them back from advancing their career - with 44% of 18-34 year olds looking to change jobs because of a lack of training and development.<sup>8</sup>

# **Disability**

### **Statistics**

### SLAB's data

20-25% of employees who completed their equality record declared a disability or long-term health condition. This level remains higher than the 2022 Scottish population in employment figure of 15.6%, but lower than the 27.1% of people with a disability in the general population.<sup>9</sup>

# Data relevant to the policy

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.<sup>10</sup>

According to data cited by Equality and Human Rights Commission (EHRC) in 2018, people with disabilities were less likely than non-disabled people to have attended an education course or received job-related training and they were less likely to have a degree-level qualification.<sup>11</sup>

According to the World Health Organization, one in six people experience some form of disability globally. A 2024 People management article stated that without accessible content, those workers living with a disability or neurodiversity may not have the same opportunity as their peers to learn and grow, jeopardising their potential and performance.<sup>12</sup>

<sup>&</sup>lt;sup>5</sup>Centre for Ageing Better, Ageism: What's the harm?, Centre for Ageing Better, 2023

<sup>&</sup>lt;sup>6</sup> Centre for Ageing Better, <u>Career development at all ages</u>

<sup>&</sup>lt;sup>7</sup> ONS, Reasons for workers aged over 50 years leaving employment since the start of the coronavirus pandemic

<sup>&</sup>lt;sup>8</sup> Cypher Learning, <u>2024 Survey Report on Employee attitudes to L&D</u>

<sup>&</sup>lt;sup>9</sup> 2023-24 SLAB Annual Report & Accounts

<sup>&</sup>lt;sup>10</sup> LSE, <u>Disability inclusion at work</u>

<sup>&</sup>lt;sup>11</sup> EHRC, <u>Is Scotland Fairer?</u>

<sup>&</sup>lt;sup>12</sup> People Management, <u>Inclusive L&D: the importance of accessible e-learning content</u>

### Evidence on different disabilities

# Physical disabilities

No impact identified.

# Learning disabilities

During 2023/2024 Dyslexia Scotland in conjunction with University of Glasgow undertook a national survey. 69% of dyslexic individuals reported that their dyslexia negatively impacted their educational opportunities.<sup>13</sup>

#### Mental health

What Works Centre for Wellbeing programme of research document was published in January 2025, which stated there is robust evidence that, in general, learning is good for wellbeing via social contact, skill acquisition and improvements in confidence and self-esteem.<sup>14</sup>

#### Sex

### **Statistics**

### SLAB's data

Women make up 65-70% of the SLAB workforce. The 2022 population data shows that in the general population 52% were female and 48% were male and of those in employment.<sup>15</sup>

# Data relevant to the policy

The Houses of Parliament publication on unpaid carers (more female carers than male carers in every age group) states that providing unpaid care is associated with a negative impact on the carer's employment.<sup>16</sup>

In relation to research into the gender pay gap, the EHRC found that despite advances in higher education there were differences in on-the job training between women and men and there remained a lack of progression for women primarily because of taking time out to have children.<sup>17</sup>

### Evidence on women

Engender states that women are more likely to be underemployed relative to their skill and qualification level and are affected by occupational segregation trends.<sup>18</sup>

Close the Gap state women are more likely to have caring responsibilities, which means they are more likely to find it difficult to participate in training and development opportunities that take place outside of normal working hours. <sup>19</sup>

### Evidence on men

No impact identified.

<sup>&</sup>lt;sup>13</sup> Dyslexia Scotland, <u>Towards a dyslexia friendly Scotland</u>

<sup>&</sup>lt;sup>14</sup> GOV.UK, <u>A rapid review of reviews on the nature of the relationship between learning and development and employee engagement, wellbeing, attraction and retention</u>

<sup>15 2023-24</sup> SLAB Annual Report & Accounts

<sup>&</sup>lt;sup>16</sup> Houses of Parliament, <u>Unpaid Care</u>

<sup>&</sup>lt;sup>17</sup> EHRC, The gender pay gap

<sup>&</sup>lt;sup>18</sup> Engender, Gender Matters | Employment and labour market

<sup>&</sup>lt;sup>19</sup> Close the Gap, <u>Training and development</u>

### Race

#### **Statistics**

### SLAB's data

Our data tells us that our employee ethnic origin demographic is:

- 85-90% White Scottish and other British
- <5% White minority</li>
- <5% minority ethnic groups</li>
- 5-10% selected prefer not to say.

9.8% of the Scottish people in work population fall into the category of minority ethnic groups, whilst the equivalent SLAB figure is less than 5%: this suggests that group is somewhat underrepresented. However, there has been an increase in that group of plus 1.4% since our last report. On the other two categories, our staff balance is more broadly comparable to the Scottish people in work population. <sup>20</sup>

# Data relevant to the policy

The 2021 CIPD report on Race Inclusion stated BAME group respondents are more likely than white British to say that their career progression has failed to meet their expectations because there are a lack of effective training and development programmes at work (25% vs 18%) or because they received no training or inadequate training when they first entered the workplace (18% vs 12%).<sup>21</sup>

### Evidence on different ethnicities

The 2021 CIPD report on Race Inclusion stated:

- One-third fewer BAME group respondents (14%) than white British ethnicity ones (21%) said that their employer having paid for them to study for a qualification or new skills outside work has contributed to their career progression.
- To the question in my organisation, everyone has the same opportunity to achieve their potential at work, no matter their racial or ethnic identity or background. African ethnicity respondents agreed least (41%) while white other respondents are in most agreement (64%).<sup>22</sup>

# Evidence on people whose first language is not English

The McGregor-Smith review – Race in the Workplace, stated that 10% of BME individuals stated that they think the Language barrier impacted upon their progression at work.<sup>23</sup>

# **Gender reassignment**

# **Statistics**

# SLAB's data

SLAB monitor data in relation to gender reassignment but do not publish it due to the risk of disclosure and identifying individuals. We continue to engage with staff about their lived experience and impact of our policies.

<sup>&</sup>lt;sup>20</sup> 2023-24 SLAB Annual Report & Accounts

<sup>&</sup>lt;sup>21</sup> CIPD Race inclusion reports. Report 3 – Ensuring equality of career progression opportunities

<sup>&</sup>lt;sup>22</sup> CIPD Race inclusion reports. Report 3 – Ensuring equality of career progression opportunities

<sup>&</sup>lt;sup>23</sup> Government, Race in the workplace: The McGregor-Smith review

# Data relevant to the policy

There is evidence from other jurisdictions that transgender people are 11.7% less likely to be employed than equivalent non-transgender individuals.<sup>24</sup>

# Evidence on trans people

A research project from YouGov on behalf of the Civil Service Rainbow Alliance reported that 40% of Trans civil servants believed that others had made assumptions about their career aspirations and abilities to progress because of their gender identity. Participating in training courses is the second most common reason for Trans respondents to feel uncomfortable at work (27%).<sup>25</sup>

# **Sexual orientation**

### **Statistics**

# SLAB's data

Less than 5% of employees identify as lesbian, gay, bisexual, or other/unsure. LGB and 'Other' representation appears relatively comparable to the 2022 general Scottish population (4.3%) and the population of people who are in employment (4.6%).<sup>26</sup>

# Data relevant to the policy

A research project from YouGov on behalf of the Civil Service Rainbow Alliance reported that around 20% of LGB civil servants believed that others had made assumptions about their career aspirations and abilities to progress because of their sexual orientation.<sup>27</sup>

# Evidence on gay men

A research project from YouGov on behalf of the Civil Service Rainbow Alliance reported that:

- 60% felt they were able to access the right learning and development opportunities when they needed to
- 61% felt the learning and development activities they had completed at work helped them develop
- 60% felt they are given real opportunity to improve their skills or encouraged to develop new skills.

# Evidence on gay women/lesbians

A research project from YouGov on behalf of the Civil Service Rainbow Alliance reported that:

- 54% felt they were able to access the right learning and development opportunities when they needed to
- 55% felt the learning and development activities they had completed at work helped them develop their career
- 53% felt they are given real opportunity to improve their skills or encouraged to develop new skills.

# Evidence on bisexual people

A research project from YouGov on behalf of the Civil Service Rainbow Alliance reported that:

<sup>&</sup>lt;sup>24</sup> Personnel Today, <u>Transgender people more likely to be out of work and on lower pay</u>

<sup>&</sup>lt;sup>25</sup> CSRA, <u>Career development for lesbian</u>, gay, <u>bisexual and transgender civil servants</u>

<sup>&</sup>lt;sup>26</sup> 2023-24 SLAB Annual Report & Accounts

<sup>&</sup>lt;sup>27</sup> CSRA, <u>Career development for lesbian</u>, gay, <u>bisexual and transgender civil servants</u>

- 55% felt they were able to access the right learning and development opportunities when they needed to
- 54% felt the learning and development activities they had completed at work helped them develop their career
- 61% felt they are given real opportunity to improve their skills or encouraged to develop new skills.<sup>28</sup>

# Religion or belief

# **Statistics**

#### SLAB's data

The number of employees identifying as Christian (30-35%) is somewhat lower than that reported for the 2022 Scottish population (37.5%) but also somewhat higher than the percentage reported for those in employment (31.3%). The percentage of employees declaring no religion (50-55%) is somewhat lower than the 2022 Scottish population (58.0%) and considerably lower than those in employment (64.4%). This continues a trend reported in previous years. The number of employees identifying with other religions or beliefs (collating Buddhist, Hindu, Muslim, and others, for example Jewish) is less than 5%, broadly in line with both the 2022 national profile and those in employment (both 4.1%). Our 'prefer not to say' figure remains relatively high at 10-15%, though again, this figure has reduced slightly since last reported.<sup>29</sup>

# Data relevant to the policy

# Evidence on different religions

In February 2020 Office for National Statistics released an article stating between 2012 and 2018 in England and Wales:

- those who identified as Christian were consistently less likely to report having a degree or equivalent qualification than all other religious groups
- those who identified as Muslim had the lowest employment rate of all religious groups
- 40% of employees who identified as Jewish reported being employed as a manager (this was the highest across all religious groups)
- Employees who identified as Muslim were the least likely to be employed as a manager (this was lower than for all other religious groups).<sup>30</sup>

A 2017 article in Work Employment and Society stated that education plays a key factor in determining the probability of Muslim women joining the labour market and obtaining salariat jobs. However, it also stated that Black-Muslim women, along with the penalties they experience in unemployment and obtaining salariat jobs, appear to be the most disadvantaged female Muslim group in the UK.<sup>31</sup>

<sup>&</sup>lt;sup>28</sup> CSRA, Career development for lesbian, gay, bisexual and transgender civil servants

<sup>&</sup>lt;sup>29</sup> 2023-24 SLAB Annual Report & Accounts

<sup>&</sup>lt;sup>30</sup> ONS, Religion, education and work in England and Wales

<sup>&</sup>lt;sup>31</sup> Work Employment Society, <u>Can Religious Affiliation Explain the Disadvantage of Muslim Women in the British Labour</u> <u>Market?</u> (2017)

# **Pregnancy or maternity**

#### **Statistics**

### SLAB's data

In 2023-24, 100% of maternity leavers returned to work. Of these, 50% requested a variation to their contractual hours on return to work and all were approved on a permanent basis.<sup>32</sup>

# Data relevant to the policy

The Equality and Human Rights Commission (EHRC) found that the reasons given by employers who were unwilling to employ pregnant women was because they believed that the time spent training new employees is wasted if they go off on maternity leave. It was also found that some employers believed that women returning from maternity leave chose not to go on training and were not interested further progression, which was not reflected in the responses from the employees themselves.<sup>33</sup>

# **Evidence on pregnancy and maternity**

ACAS states that employers must keep those on maternity leave updated on training and development opportunities that might affect them.<sup>34</sup>

# Marriage/civil partnership (only applies to policies related to employment) Statistics

### SLAB's data

The proportion of employees who are single/never married (30-35%) is lower than in the general working population (43%), whilst the proportion of married employees in SLAB is comparatively higher (50-55% compared to 46%).

The remaining categories are all comparable in size.<sup>35</sup>

# Data relevant to the policy

No Impact identified.

# Evidence on marriage and civil partnership

Unlike other forms of discrimination, pregnancy and maternity, and marriage and civil partnership, are not protected under the harassment provisions.<sup>36</sup>

# **Care Experienced**

### **Statistics**

#### SLAB's data

5-10% of all staff declare they are care-experienced, 80-85% are not and 10-15% prefer not to say.<sup>37</sup>

This roughly aligns with national data Who Cares Scotland.<sup>38</sup>

<sup>32 2023-24</sup> SLAB Annual Report & Accounts

<sup>33</sup> EHRC, Pregnancy and maternity discrimination research findings

<sup>&</sup>lt;sup>34</sup> Acas, Planning maternity leave - Managing pregnancy and maternity

<sup>35 2023-24</sup> SLAB Annual Report & Accounts

<sup>&</sup>lt;sup>36</sup> EHRC, Sexual harassment and harassment at work (2020)

<sup>&</sup>lt;sup>37</sup> SLAB, Equality monitoring of employee protected characteristics 2023-24

<sup>38</sup> Who Cares? Scotland - Statistics

# Data relevant to the policy

# Evidence on care experienced people

Care experienced people face challenges and disadvantages in education, employment and training. They often struggle to find and sustain career options when leaving care, which can increase the risk of long-term unemployment, poverty or social exclusion. They are less likely to have formal training or qualifications. This can be an obstacle for them getting qualified positions, as the labour market tends to place a high importance on academic achievement. In addition, there are often stereotypes about care experience people, which means that employers might have lower expectations of them and not offer support or training when needed.<sup>39</sup>

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

Based on the information gathered above, it is likely that the policy impacts on many of the protected characteristics and in particular age, disability, sex, pregnancy/maternity, religion/belief and race. Any other potential impacts will be investigated during the consultation process.

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

You now have three options regarding next steps:

- 1. If there is no relevance to equalities or our corporate parenting duties, proceed to <u>Step 5</u>: agree with decision-makers that no EqIA is required based on current evidence
- 2. If there is relevant to some or all the equality groups and/or our corporate parenting duties, proceed to <a href="Step 3">Step 3</a>: complete full EqIA
- 3. If it is unclear if there is relevance to some or all the equality groups and/or our corporate duties, proceed to <u>Step 3</u>: complete full EqIA.

Please select your decision: Proceed to Step 3 - complete full EqIA.

Please outline the reasoning behind your decision:

There is relevance to some or all the equality groups and/or our corporate parenting duties.

# Step 3: Stakeholder involvement and consultation

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

•		
V	/മറ	
- 1	C 2	٠.

<sup>&</sup>lt;sup>39</sup> Iriss, <u>Care experience and employment</u>

# 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?

# Staff Survey - September 2023:

- 90% of respondents indicated that their line manager is considerate of their life outside of work
- 89% of responded positively to the question "the people in my team can be relied upon when things get difficult"
- 16% of respondents indicated that they never discussed their personal wellbeing and/or work related stress with their manager
- Less than 30% of respondents had regular discussions with their manager about their personal wellbeing and/or work-related stress
- 78% of managers responded that they felt confident in supporting the health and wellbeing of the people they manage
- 77% of employees indicated that they can access the right learning and development opportunities when needed
- 41% of employees indicated that there are opportunities to develop their career at SLAB
- 55% of employees indicated that learning and development activities they had completed in the last 12 months have helped them improve their performance
- A higher proportion of respondents aged 18-34 agreed with the statement that there are opportunities to develop their career in SLAB (60% compared to 41% on average).

# **Employee and Trade Union Consultation - April 2025:**

93.5% either did not know or did not think that the proposed policy would make different impact on people with protected characteristics.

When the policy was mentioned directly, the following comments were made by respondents:

- > Employees within some equality groups will be better than others in advocating for their needs.
- Employees with caring responsibilities may be unable to utilise additional learning and development opportunities if they are not afforded more paid time off during the working day.
- > The current LMS, for example, does not offer larger format or audio alternatives for the tests.

# Step 4: Impact on equality groups and steps to address these

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

# Age

Potential for discrimination: Positive impact(s).

**Potential for developing good relations**: Positive impact(s).

Potential to advance equality: Positive impact(s).

Describe the changes or actions 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.

Evidence suggests that older workers are frequently subjected to stereotypes related to their motivation, cognitive abilities, and usage of technology.

To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and to mitigate their negative impact, the policy offers all employees equal access to Learning and Development opportunities.

The policy also states all employees will have frequent and meaningful conversations with their manager about their performance and development. To ensure that this positive impact is maximised, managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given any relevant training.

The requirement to work 12 months after end of a course may put older workers closer to retirement age, off applying for financial assistance. However, given the financial investment on the part of SLAB and the requirement to justify spending public funds, the rule is likely to be a proportionate means of achieving a legitimate business aim. The policy clearly highlights the requirement to work 12 months following the end of a course and the repayment plan, should this not be the case.

# **Disability**

Potential for discrimination: Positive impact(s).

**Potential for developing good relations**: Positive impact(s).

Potential to advance equality: Positive impact(s).

Describe the changes or actions 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.

Evidence suggests biases may be expressed by underestimating the productivity and capacity of disabled employees and overestimating the cost of reasonable adjustments.

To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and to mitigate their negative impact, the policy offers all employees equal access to learning and development opportunities.

The policy also states all employees will have frequent and meaningful conversations with their manager about their performance and development. To ensure that this positive impact is maximised, managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given any relevant training.

To further support those whose specific needs arise from neurodiversity, a dedicated policy on neurodiversity is to be developed in due course.

Wording has been added to the policy to clarify that in exceptional circumstances, the need to repay course fees could be reviewed. While consideration will be on a case-by-case basis, ill health may be a life event where this would apply.

# Sex

**Potential for discrimination**: Positive impact(s).

**Potential for developing good relations**: Positive impact(s).

Potential to advance equality: Positive impact(s).

Describe the changes or actions 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.

Evidence suggests that sexism, particularly female employees, affects a significant proportion of the UK workforce.

Evidence also suggests that there are more female carers than male carers, which can impact on the time available to undertake training.

To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and to mitigate their negative impact, the policy offers all employees equal access to learning and development opportunities. Four paid study days per Further Qualification Fund application in conjunction with SLAB's flexible working policy will help make learning and development more accessible for all.

The policy also states all employees will have frequent and meaningful conversations with their manager about their performance and development. To ensure that this positive impact is maximised, managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given any relevant training.

### Race

**Potential for discrimination**: Positive impact(s).

**Potential for developing good relations**: Positive impact(s).

**Potential to advance equality**: Positive impact(s).

Describe the changes or actions 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.

Evidence suggests that ethnic minority communities are more likely to say that their career progression has failed to meet their expectations because there are a lack of effective training and development programmes at work or because they received no or inadequate training when they first entered the workplace. To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and to mitigate their negative impact, the policy offers all employees equal access to learning and development opportunities.

The policy also states all employees will have frequent and meaningful conversations with their manager about their performance and development. To ensure that this positive impact is maximised, managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given any relevant training.

# **Gender reassignment**

Potential for discrimination: No impact.

Potential for developing good relations: No impact.

Potential to advance equality: No impact.

Describe the changes or actions you plan to. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.

The L&D policy will have no impact on this group. Therefore, no change or action required.

# **Sexual orientation**

Potential for discrimination: Positive impact(s).

**Potential for developing good relations**: Positive impact(s).

Potential to advance equality: Positive impact(s).

Describe the changes or actions 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.

There is evidence to suggest that LGBT+ workers believe that others have made assumptions about their career aspirations and abilities to progress because of their sexual orientation. To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and to mitigate their negative impact, the policy offers all employees equal access to learning and development opportunities.

The policy also states all employees will have frequent and meaningful conversations with their manager about their performance and development. To ensure that this positive impact is maximised, managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given any relevant training.

# **Religion or Belief**

Potential for discrimination: Positive impact(s).

**Potential for developing good relations**: Positive impact(s).

Potential to advance equality: Positive impact(s).

Describe the changes or actions 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.

The evidence suggests that there is disparity in qualifications and work progression to management roles, of workers in different religious identities.

To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and to mitigate their negative impact, the policy offers all employees equal access to learning and development opportunities.

The policy also states all employees will have frequent and meaningful conversations with their manager about their performance and development. To ensure that this positive impact is maximised, managers, People & OD employees, and anyone else involved in making decisions covered by this policy will be given any relevant training.

# **Pregnancy & Maternity**

Potential for discrimination: Positive impact(s).

Potential for developing good relations: Positive impact(s).

Potential to advance equality: Positive impact(s).

Describe the changes or actions 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

Evidence suggests some employers believe women returning from maternity leave chose not to go on learning and not interested in further progression. They also believed that training for pregnant employees was a waste of resource.

To prevent acts of discrimination, exclusion, unfair treatment and other negative or demeaning behaviours and to mitigate their negative impact, the policy offers all employees equal access to learning and development opportunities.

The policy also states all employees will have frequent and meaningful conversations with their manager about their performance and development.

To ensure that this positive impact is maximised, managers, People & OD employees and anyone else involved in making decisions covered by this policy will be given any relevant training.

Wording has been added to the policy to clarify that in exceptional circumstances, the need to repay course fees could be reviewed. While consideration will be on a case-by-case basis, pregnancy & maternity may be a life event where this would apply.

# Marriage & Civil Partnership (only applies to policies related to employment)

Potential for discrimination: No impact.

Potential for developing good relations: No impact.

Potential to advance equality: No impact.

Describe the changes or actions you plan to. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.

The L&D policy will have no impact on this group. Therefore, no change or action required.

# Care experience

Potential for discrimination: No impact.

Potential for developing good relations: No impact.

Potential to advance equality: No impact.

Describe the changes or actions 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.

The L&D policy will have no impact on this group. Therefore, no change or action required.

# 4.2. Which actions have you taken as part of this assessment?

Choose from one of the following implications for the policy/practice/process/service:

# 1. No major change

Your assessment demonstrates that the policy/practice/process/service is robust. The evidence shows 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.

# 2. Adjust the policy/practice/process/service

You have taken steps to remove any barriers, to better advance equality of opportunity or 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.

# 3. 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 EqIA 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 it is and how the decision was reached.

# 4. 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.

Please select the outcome of the assessment: Adjust the policy/practice/process/service.

# Please explain the changes that have been made:

We conducted a consultation with all staff and our recognised Union seeking views on the refreshed policy and made changes to the policy as a result. Support documentation will be produced along with specific training for managers.

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

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 March 2025:** Regular reviews and updates to the EqIA between Policy staff and People & OD colleagues.

April 2025: Consultation with Employees and our recognised Trade Union.

**May 2025:** Following consultation with employees and our recognised Trade Union changes made to the policy and EqIA.

# Step 6: Post-implementation actions and monitoring impact

# 6.1. Record any ongoing actions below

- 1. Monitor learning requested by each of the protected characteristics to help us form any better conclusion in terms of equality (People & OD team ongoing).
- 2. All employees will be alerted to this refreshed policy (People & OD team from May 2025).
- 3. Training on the policy will be available to all managers (People & OD team from May 2025).

# 6.2. Note here how you intend to monitor the impact of this policy/practice/process/service on equality groups.

- List all 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 or individual	Reporting (where and frequency)
Staff Survey	People & OD with policy support for	Every two years, to board and
	analysis	Executive Team
Ongoing review	People & OD with policy support for	Annually as part of our regulatory
	analysis	reporting
Ongoing review	People & OD	Monitor uptake of training based
		on protected characteristics.

# 6.3. EqIA review date

19/05/2028.

# Step 7: Assessment sign off and approval

Director/SRO sign off: 06/05/2025.

Chief Executive approval: 15/05/2025.