

# **Equality Impact Assessment (EqIA)**

## Summary results of the EqIA

Title of policy/practice/process/service: Travel & Expenses Policy.

Is the policy new (proposed), a revision to an existing policy or a review of current policy? Replaces and updates the current Staff Business Travel and Subsistence Policy, Driver and Vehicle Policy, and all previous related guidance documentation.

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

This policy sets out the guidance for employees who need to travel on SLAB business. It applies to all SLAB employees. All protected characteristics are therefore potentially of relevance. However, the equality groups we found most likely to be impacted by the policy and changes to the policy are age, disability, pregnancy/maternity and religion/belief.

We recognise that employees in certain age groups, employees with disabilities or other medical conditions, and employees who are pregnant may find business travel challenging at times. In addition, some religions or beliefs may be impacted during certain periods.

The policy addresses this by supporting managers to be aware of and provide extra support/consideration for employees in these equality groups.

#### Summary of actions taken because of this assessment:

- Consideration will be given to employees in certain age groups, those with disabilities or other
  medical conditions, those who are impacted by pregnancy/maternity and those with religious or
  other beliefs when compiling the policy
- A consultation will be conducted with all employees on the proposed policy, and it will allow
  employees to raise concerns in relation to situations, real or hypothetical, about the policy.

### Ongoing actions beyond implementation include:

• Ongoing monitoring of business journeys undertaken by employees to gauge compliance with the policy and the impact on the protected characteristics.

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

Head of Finance & Procurement.

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 & Accounts.

Publication date (for completion by Communications): 28/10/2025.

### Step 1 – Framing the planned change

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

This policy aims to set out the guidance on travelling for business purposes and the reimbursement of any additional expenditure incurred when doing so.

#### 1.2. Why is the change required?

The Staff Business Travel and Subsistence Policy was written in 2017. A review of the policy is required to ensure that it remains fit for purpose in terms of current employment and equality law. Experience since 2017, mainly from submitted expense claims, has shown that clearer guidance is required on the need to travel on business, the mode of transport to be used and the reimbursement of any additional expenditure incurred when doing so.

- a) Who is affected by this policy/practice/process/service?
   This policy applies to all SLAB employees
- b) Policy/practice/process/service implementation date? October 2025.
- c) What other SLAB policies or projects may be linked to or affected by changes to this policy/practice/process/service?
- Driving on SLAB business
- Pool cars rules of use
- Travel policy guidance document
- Flexible Working policy
- Computer Usage policy
- · Code of Conduct
- Carbon Management Plan
- Disciplinary policy.

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

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

Equality	Evidence source	What does the evidence tell you about the experiences of
characteristics	(web link, report,	this group in relation to the policy/practice/process/service?
	survey, complaint)	
Age	(1) SLAB Staff	SLAB employees are clustered around the middle age ranges
	<u>demographics</u>	with fewer employees aged <=24 years and 65+ years (both
	<u>2024-25</u>	<5%). The two largest groups are 35-44 years old and 45-54
	(2) <u>Scottish</u>	years old (both 25-30%), followed by 55-64 years old (20-25%),
	Surveys Core	and then 25-34 years old (15-20%).
	<b>Questions</b>	Proportionally our aga demographic is like the 2022 Scottish
	2023	Proportionally, our age demographic is like the 2023 Scottish
	(3) FS13 Future of	population in employment. The main difference is across the
` '	` '	lower age range where we have <5% aged <=24 years compared
	<u>Transport –</u>	

Equality	Evidence source	What does the evidence tell you about the experiences of
characteristics	(web link, report,	this group in relation to the policy/practice/process/service?
	survey, complaint)	
	Equalities and access to opportunities (4) Transport and Travel in Scotland: Results from the Scottish Household Survey	to the 2023 Scottish population in employment which is 10.7% aged <=24 years.  Potential negative impact on any employees with caring responsibilities as some ages are more likely to have childcare or other caring responsibilities which may impact their ability to undertake business journeys.  The data on caring responsibilities (for children and adults) of SLAB employees in each age group state that:  • those in the 18-24 group declare no caring responsibilities  • 23.8% in the 25-34 group have caring responsibilities  • 56% in the 35-44 group have caring responsibilities, the highest rate of all age groups  • 40.4% in the 45-54 group have caring responsibilities  • 24.7% in the 55-64 group have caring responsibilities  • 14.3% in the 65+ group have caring responsibilities.  A tendency for those in the middle of the age ranges to have more caring responsibilities can be observed.  Older people are more likely to have a disability or long-term health condition that affects their ability to use transport (3).  Younger people are less likely to own a private car (3), which makes them more reliant on public transport. One of the factors they consider when making travel choices is their personal safety (3). A lack of perceived safety when using public transport
Disability	(5) SLAB Staff demographics 2024-25 (6) Staff Survey 2023 – internal only (7) Scottish Surveys Core Questions 2023 (8) FS13 Future of Transport – Equalities and	In 2024-25,15-20% of all employees disclosed a disability (5). This level is similar than to the 2023 Scottish population in employment figure of 16% but lower than the 28% of people with a disability in the general population (7). However, in the 2023 SLAB Staff Survey 13% said they had a condition which lasted or was likely to last for 12 months and 11% said they had a mental health condition (6). This might suggest that the actual level of Equality Act disability amongst staff could be higher than is reported through our self-service equality data gathering process.  Accessibility is a key factor for deciding which transport mode to use for disabled people. While around 60% of disabled people have no access to a car and use the bus around 20% more than non-disabled people, 52% of working-age disabled

Equality	Evidence source	What does the evidence tell you about the experiences of
characteristics	(web link, report,	this group in relation to the policy/practice/process/service?
	survey, complaint)	
	access to opportunities	adults stated difficulty in accessing bus services. Because of these challenges, disabled people tend to rely heavily on taxis and private hire vehicles (8).  People who have special educational needs or some cognitive impairments such as dyslexia or dyspraxia can struggle to understand some types of information. Interpreting and understanding large amount of journey and ticket information can lead to high levels of stress and anxiety (8).
Race	(9) SLAB Staff demographics 2024-25 (10) Scottish Surveys Core Questions 2023 (11) FS13 Future of Transport – Equalities and access to opportunities (12) Transport and Travel in Scotland: Results from the Scottish Household Survey	The demographics of SLAB staff by race are as follows: 85-90% white majority, less than 5% white minority, less than 5% non-white minority ethnic, and 5-10% prefer not to say (9). Our employee demographic is broadly comparable to the 2019 Scottish population when compared against ethnic origin (10).  People from an ethnic minority background are less likely to have access to a private vehicle and be more reliant on public transport to access employment (11). Likewise, they are less likely to have access to a private vehicle.  People from an ethnic minority background are less likely to hold a driving licence than people from the groups White British and White Scottish (12).  Feelings of safety are important to look at when assessing travel patterns of people form ethnic minority backgrounds (11).  People from ethnic minority backgrounds are worried about racial attacks when using public transport, which can cause a barrier to using some transport networks.
Sex	(13) SLAB Staff demographics 2024-25 (14) Staff Survey 2023 – internal only (15) Scottish Government Sex & Gender Report (16) Women's & girls' views & experiences of personal safety when	Women make up 65-70% of the SLAB workforce (13). This is higher than Scottish Government workforce, where female staff make up 57.3%, compared to 51.1% of Scotland's population aged 16 to 64. (15)  The data on caring responsibilities among SLAB employees state that (14):  overall, 37% female employees have caring responsibilities towards an adult only, 3.7% towards a child and an adult, 26.4% towards a child only  overall, 37.5% male employees have caring responsibilities

Equality	Evidence source	What does the evidence tell you about the experiences of
characteristics	(web link, report,	this group in relation to the policy/practice/process/service?
	survey, complaint)	
	using public transport  (17) Young Persons' Free Bus Travel Scheme – Baseline Data Report, June 2022  (18) FS13 Future of Transport – Equalities and access to opportunities	2.7% of male employees have caring responsibilities towards an adult only, 2.7% towards a child and an adult, 32.1% towards a child only.  Feelings of personal safety and security are a barrier to women using public transport (16). Twice as many women than men disagree that they feel safe and secure on the bus and train in the evening (15). Women feel less safe when travelling at certain times of the day and at night, which impacts on the mode of transport they would prefer to use for their journeys (16).  Younger women report feeling more vulnerable because of their age, and they report that they can attract more unwanted attention from men than older women.
		Women from ethnic minority backgrounds report issues with both drivers and passengers which make them feel unsafe on public transport.
		Women report amending their journeys when they feel unsafe. Strategies can include extending or reducing journeys, using private transport, paying special attention to their physical appearance.
Gender Reassignment	(19) SLAB Staff demographics	Fewer than 5% of SLAB's staff indicated that they are not the same gender identity they were assigned at birth (19).
	2024-25 (20) FS13 Future of Transport – Equalities and	Safety and perception of safety is a worry for trans people on the streets and when using public transport, and their greatest worry is being a victim of a violent crime or harassment (20).
	access to opportunities (21) Life in Scotland for LGBT Young People – Trans Report 2024 (22) Scottish Trans and Non-	Only 40% of young trans people report feeling safe on public transport. The feeling of being visible as a trans person leaves them feeling vulnerable to harassment or discrimination in public transport (21).
		Trans people can experience discrimination and harassment when using public transport, which means that they might try to avoid using this mode of transport at certain times of day (22).
	binary Experiences: Research Report	

Equality	Evidence source	What does the evidence tell you about the experiences of
characteristics	(web link, report,	this group in relation to the policy/practice/process/service?
	survey, complaint)	
Sexual orientation	(23) SLAB Staff demographics 2024-25 (24) Scottish Surveys Core Questions 2023 (25) FS13 Future of Transport – Equalities and access to opportunities (26) Hate crimes recorded by the police in Scotland, 2022-23	Fewer than 5% of SLAB's staff indicated they are either lesbian, gay or bisexual (23); this is comparable to national statistics (24).  Safety, security and perception of safety is a key issue for LGB people (25).  In Scotland in 2022-23, 26% of hate crimes included a sexual orientation aggravator (26).
Religion or Belief	(27) SLAB Staff demographics 2024-25 (28) FS13 Future of Transport – Equalities and access to opportunities (29) Hate crimes recorded by the police in Scotland, 2022-23	Of all staff, around 40% employees declared a religion or belief (35-40% Christian and less than 5% other religion). SLAB collects statistics as to the breakdown of employees of a non-Christian religion, but small numbers mean this cannot be reported due to data suppression (27).  Safety and perception of safety is important for people from some religious or faith communities for whom concern about hate crime is a particular issue. In Scotland in 2022-23, 10% of hate crimes has a religion aggravator (29). For some religious people who have marked religious identity through clothing, there is a higher risk for discrimination, especially for women (28).
Pregnancy or maternity	(30) SLAB Annual Report and Accounts 2023-24 (31) Staff consultations on HR policies – internal only	In 2023-24, 100% of maternity leavers returned to work. Of these, 60% requested a variation to their contractual hours on return to work and all were approved on a permanent basis. SLAB does not gather information on absence rates among this protected characteristic group (30).  No feedback specific to the protected characteristic of pregnancy and maternity has been received through the staff consultation carried out in March 2023 (31).
Marriage/civil partnership	(32) Staff consultations	We have no evidence in relation to SLAB employees or from wider desk research that there is a significant impact, positive or negative, for this group in terms of this policy. Marriage and

Equality	Evidence source	What does the evidence tell you about the experiences of
characteristics	(web link, report,	this group in relation to the policy/practice/process/service?
	survey, complaint)	
	on HR policies –	civil partnership status is not collected as part of the
	internal only	recruitment process and so we do not appear to have clear
		statistics on the breakdown of staff according to this PC (32).
Care	(33) SLAB Staff	5-10% of all staff members declare they are care-experienced,
Experienced	<u>demographics</u> 2024-25	80-85% are not and 10-15% prefer not to say (33).
(corporate		
parenting duty)		

1.2 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, the main impacts of this policy are likely to be in relation to age, disability, and pregnancy/maternity. Any other potential impacts should be investigated during the consultation process.

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

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 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 the equality groups and/or our corporate parenting duties	N	Proceed to Step 3: complete full EqIA

## Step 3 – stakeholder involvement and consultation

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

Yes.

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

SLAB leadership team, employees, and our recognised Trade Union.

### 1.3 What did you learn from the consultation/involvement?

Employee and Trade Union Consultation – April 2025 – 13% of respondents thought that the proposed travel policy might have a negative impact on certain groups with protected characteristics.

The following comments were made by respondents:

- Employees under 25 years old not being able to access business cars for travel would put them at a disadvantage
- Public transport might not be the most appropriate mode of travel in all circumstances, especially
  for people with disabilities, mental health conditions, or pregnant employees (mental health
  conditions were not mentioned in the policy, only being physically able to take public transport)
- Transporting heavy bags and materials on public transport might be difficult for some employees, such as people with disabilities and pregnant employees.

Following the consultation, we have made the following changes to the policy:

- 1. Removed duplicate paragraphs.
- 2. Revise wording on Justification (to explain to use mileage claim).
- 3. Revised wording on CLS exemption (make more of an example of justification).
- 4. Added back the family and friend accommodation option.

### 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	Place 'X' box(es)	Place 'X' in the relevant		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	Details
potential for discrimination	X			The proposed policy allows for staff of any age to travel. There are no restrictions in the policy set by SLAB. There are age restrictions which are imposed throughout the insurance industry regarding those travelling via car under the age of 25 however this is outside our control and there are other modes of transport available to that age group. Staff members under 25 will have to consider other options for travel (public transport, using pool cars with other staff members), or aim to use online meeting tools.

				However, this would have a limited impact on younger staff as less than 5% of the workforce is under 25.
potential for developing good relations			х	
potential to advance equality of opportunity			X	
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	Details
potential for discrimination	x			Risk impact is mitigated as travel is largely during the day (Monday to Friday), and the policy explains staff should not travel against medical advice and various modes of transport are available to suit requirements. Any concern of personal safety can be raised with manager and/or People & OD ahead of travel to assess if a reasonable adjustment could be made or if travel is required at all. The travel booking portal also allows staff to choose the location that suits their needs best and any deviation from cost for safety circumstance could be discussed with manager and/or People & OD to agree a reasonable adjustment (for example, breaching cost barriers).
potential for developing good relations			х	
potential to advance equality of opportunity			x	
Disability	Place 'X' in the relevant box(es)		ant	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	Details

potential for discrimination	х			Risk impact is mitigated as travel is largely during the day (Monday to Friday), and the policy explains staff should not travel against medical advice and there are various modes of transport available to suit requirements.
developing good relations			X	
potential to advance equality of opportunity			х	
Gender reassignment	Place 'X' box(es)	in the relev	/ant	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	Details
potential for discrimination	X			Risk impact is mitigated as travel is largely during the day (Monday to Friday), and the policy explains staff should not travel against medical advice and various modes of transport are available to suit requirements. Any concern of personal safety can be raised with manager and/or People & OD ahead of travel to assess if a reasonable adjustment could be made or if travel is required at all. The travel booking portal also allows staff to choose the location that suits their needs best and any deviation from cost for safety circumstance could be discussed with manager and/or People & OD to agree a reasonable adjustment (for example, breaching cost barriers).
potential for developing good relations			Х	
potential to advance equality of opportunity			х	
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	Details
potential for discrimination	X			Risk impact is mitigated as travel is largely during the day (Monday to Friday), and the policy explains staff should not travel against medical advice and various modes of transport are available to suit requirements. Any concern of personal safety can be raised with manager and/or People & OD ahead of travel to assess if a reasonable adjustment could be made or if travel is required at all. The travel booking portal also allows staff to choose the location that suits their needs best and any deviation from cost for safety circumstance could be discussed with manager and/or People & OD to agree a reasonable adjustment (for example, breaching cost barriers).
potential for developing good relations			х	
potential to advance equality of opportunity			х	
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	Details
potential for discrimination	X			Risk impact is mitigated as travel is largely during the day (Monday to Friday), and the policy explains staff should not travel against medical advice and various modes of transport are available to suit requirements. Any concern of personal safety can be raised with manager and/or People & OD ahead of travel to assess if a reasonable adjustment could be made or if travel is required at all. The travel booking portal also allows staff to choose the location that suits their needs best and any deviation from cost for safety circumstance could be discussed with manager and/or People & OD to agree a reasonable adjustment (for example, breaching cost barriers).
potential for developing good relations			X	

potential to advance equality of opportunity			х	
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	Details
potential for discrimination	X			Risk impact is mitigated as travel is largely during the day (Monday to Friday), and the policy explains staff should not travel against medical advice and various modes of transport are available to suit requirements. Any concern of personal safety can be raised with manager and/or People & OD ahead of travel to assess if a reasonable adjustment could be made or if travel is required at all. The travel booking portal also allows staff to choose the location that suits their needs best and any deviation from cost for safety circumstance could be discussed with manager and/or People & OD to agree a reasonable adjustment (for example, breaching cost barriers).
developing good relations			X	
potential to advance equality of opportunity			х	
Pregnancy & Maternity	Place 'X' in the relevant box(es)		ant	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	Details
potential for discrimination	х			Risk impact is mitigated as travel is largely during the day (Monday to Friday), and the policy explains that staff should not travel against medical advice and there are various modes of transport available to suit requirements.

		х	
		X	
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	Details
		x	
		х	
		X	
Place 'X' in the relevant box(es)		ant	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	Details
		X	
		х	
		х	
	Positive impacts  Place 'X' box(es)	Positive impacts  Place 'X' in the relevative box(es)  Positive Negative	Place 'X' in the relevant box(es)  Positive impacts No impact  X  X  Place 'X' in the relevant box(es)  Positive impacts No impact  X  X  X  A  Place 'X' in the relevant box(es)  Positive impacts No impact  X  X

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

Employee and managers' guidelines will be produced.

Training to those involved in making decisions with this policy may be required.

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	Implications for the policy/practice/process/service			
select (X)				
	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.			
	Adjust the policy/practice/process/service			
x	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.			
	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.			
	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.			

# 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.

The policy was discussed regularly with the Director of Corporate Services & Accounts. The policy was shared with staff for consultation and with union representatives.

As a result of staff consultation there were workshops held across June and July 2025 with representatives for key travel groups to discuss feedback from the consultation to clear up misinterpretations and "myth bust" common concerns.

### Step 6 - Post-implementation actions and monitoring impact

### 6.1 Record any ongoing actions below.

No changes are planned but there will be ongoing monitoring of business journeys undertaken by employees to gauge compliance with the policy and the impact on the protected characteristics.

This analysis will help show if the policy requires any adaptations in future (sooner than the planned review in five years).

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

Measure	Lead department/Individual	Reporting (where/frequency)
Monitoring of business journeys	Finance & Procurement	Head of Finance &
undertaken by employees		Procurement as required

#### 6.3 EqIA review date.

This EqIA 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.

01/09/2028

### Step 7 – Assessment sign off and approval

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

Director/SRO sign off: 30/08/2025.

Chief Executive approval: 09/09/2025.