

Equality Impact Assessment- Results

**Coronavirus (COVID-19): manufacturing
sector guidance**

August 2020

EQUALITY IMPACT ASSESSMENT- RESULTS

Title of policy	COVID-19 Manufacturing Guidance published 26 May 2020 (and subsequent revisions)
Summary of aims and desired outcomes of policy	<p>The aim of publishing the COVID-19 Manufacturing Guidance for the manufacturing sector is to support restarting operations in a safe way that ensures physical distancing is adhered to, alongside enhanced hygiene and cleaning standards during the pandemic.</p> <p>The guidance is subject to ongoing 3 weekly revisions, with updated versions being published until it is no longer required.</p>
Author of the results EQIA	This Results Equality Impact Assessment (EQIA) has been prepared by the Advanced Manufacturing team, Manufacturing and Industries Division, Directorate for Economic Development
Date of publication	<p>14 August 2020</p> <p>This EQIA will remain live after publication and will be continuously reviewed as the guidance is updated and we progress through the route map.</p>

EXECUTIVE SUMMARY

This document supports consideration of the impact of the [COVID-19 Manufacturing Sector Guidance](#) with protected characteristics.

All Scottish Government sectoral guidance is being developed in line with our principles for decision making. These are:-

- **Safe:** We will ensure that transmission of the virus remains suppressed and that our NHS and care services are not overwhelmed
- **Lawful:** We will respect the rule of law which will include ensuring that any restrictions are justified, necessary and proportionate
- **Evidence-based:** We will use the best available evidence and analysis
- **Fair and ethical:** We will uphold the principles of human rights, dignity, autonomy, respect and equality.
- **Clear:** We will provide clarity to the public to enable compliance, engagement and accountability.
- **Realistic:** We will consider the viability and effectiveness of options.

- **Collective:** We will work with our partners and stakeholders, including the UK Government and other Devolved Nations, ensuring that we meet the specific needs of Scotland.

In carrying out this assessment, the Scottish Government is mindful of the three needs of the Public Sector Equality Duty (PSED) - eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between people who share a protected characteristic and those who do not, and foster good relations between people who share a protected characteristic and those who do not - and recognises while the measures may positively impact on one or more of the protected characteristics¹, also recognises that the introduction of the measures may have a disproportionate negative impact on one or more of the protected characteristics. Where any negative impacts have been identified, we have sought to mitigate/eliminate these. We are also mindful that the equality duty is not just about negating or mitigating negative impacts, as we also have a positive duty to promote equality. We have sought to do this through support and guidance.

The Manufacturing Sector Guidance is aimed at manufacturers and will have an impact on their workforce (broadly defined to include employees, agency staff, contractors/supply chain).

When Scotland entered lockdown on 23 March, all non-essential manufacturers were closed on a precautionary basis, to reduce the risk of transmission of the virus. Essential manufacturing, necessary for the effort against COVID-19 or the wellbeing of society, continued throughout lockdown. On 29 June, non-essential manufacturers were able to reopen, subject to robust risk assessments, physical distancing and enhanced hygiene measures.

²Evidence shows that: low paid workers, in particular women, disabled workers and minority ethnic workers were seven times more likely than high earners to have worked in a sector that has shut down as a result of the lockdown; ³lower earners are three times as likely to have lost their job or been furloughed as high earners; and are more than twice as likely to do jobs exposing them to health risks. The safe return to work will see a restoration of income for furloughed workers whose income has fallen below the current rate of the real living wage where the employer has not bridged the 20% shortfall for furloughed staff.

It has been identified that the guidance may have some impact on all 9 protected characteristic groups, with some groups being more disproportionately impacted than others. As above, where any negative impacts have been identified, we have sought to address these in the guidance.

Overall we expect that workers in the manufacturing sector who have protected characteristics will benefit directly from the guidance through appropriate risk assessment and implementation of measures to reduce the spread of COVID-19 in the workplace.

¹ Section 4 of the Equality Act 2010

² <https://www.ifs.org.uk/publications/14791>

³ <https://www.resolutionfoundation.org/app/uploads/2020/06/A-new-settlement-for-the-low-paid.pdf>

We currently think that the guidance is likely to have most differential impact on people with protected characteristics relating to age, race, disability and sex. However, it should be noted that this is a 'live' document which will be regularly reviewed.

Mitigating Actions

Characteristic	Summary of relevant impact	Proposed mitigating actions
Age	<p>⁴36.5% of the manufacturing workforce are aged 50+.</p> <p>Evidence workers in the 50+ age group may have more health issues than those under 50.</p> <p>Older workers have higher prevalence of serious illness from COVID-19.</p> <p>Older people in the community have a higher prevalence of serious illness from COVID-19.</p> <p>Grandparents may be required to look after children when parents return to work. Older people have a higher prevalence of serious illness from COVID-19.</p>	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policy.</p> <p>During Phase 1 of the Route Map, the default position is for home working so the majority of older workers should be working from home - where the work can be done at home, or furloughed. However, from phase 2, this group will see a return to the workplace, where it is safe to do so and where homeworking is not possible. Where it is not safe to return to work immediately, workers may be able to remain furloughed for a period of time.</p> <p>Safe working in line with the guidance will reduce the risk of transmission of the virus in the workplace, and reduce the risk of community transmission.</p> <p>Guidance will be reviewed as more evidence is received about the impact of the</p>

⁴ <https://www.gov.scot/publications/scotlands-labour-market-people-places-and-regions-background-tables/>

	<p>A higher proportion of carers aged 65+ provide 50 hours or more of unpaid care each week (22%) than younger age groups (14% of those aged 45-64, 12% of those aged 16-44 and 2% of those aged 4-15).⁵</p> <p>Younger people: evidence there are positive impacts on many children from having increased family time. There will also be stresses over home schooling with strained relationships developing with parents who are trying to juggle work and time with their family. Impact will partially depend on how supportive employer policies are. 27.6% of the manufacturing workforce are parents.</p> <p>Apprenticeships for younger people may be impacted. 11.4% of the manufacturing workforce are aged 16-24.</p>	<p>guidance on grandparents providing childcare.</p> <p>Evidence on the impact of COVID on vulnerable children and young people has also been published with further evidence due in July⁶.</p> <p>Guidance will be reviewed as more evidence is received about the impact of the guidance on children.</p> <p>Guidance will be reviewed as more evidence is received about the effect on apprenticeships. SG's Making Scotland's Future programme will include supportive measures for the future of apprenticeships in the sector.</p>
Disability	<p>Workers in this group may be more likely to have a higher prevalence serious illness from COVID-19 due to underlying health issues than non-disabled staff.</p> <ul style="list-style-type: none"> • Many disabled workers are fearful of the relaxing of restrictions and return to work. Disabled workers may find it more challenging to attend work and undertake social distancing but this will be dependent on their disability. • Changes to the workplace, such as screens, one way systems, entrance/exit doors 	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals.</p> <p>During Phase 1 of the Route Map, the majority of people with a disability, and workers with underlying health issues, should be working from home - where the work can be done at</p>

⁵ [Scottish Health Survey, 2018](#) ; [Scottish Schools Adolescent Lifestyle and Substance Use Survey \(SALSUS\) 2015: Mental Wellbeing Report](#)

⁶ <https://www.gov.scot/publications/vulnerable-children-report-15-2020-scottish-government-solace/pages/impact-of-the-outbreak-on-children-and-families/>

	<p>may impact a person with limited mobility's ability to move around the workplace safely.</p> <ul style="list-style-type: none"> • Workers who had pre-COVID reasonable adjustments at work, as required by the Equality Act 2010, may find that these adjustments are no longer available or safe to use due to COVID safety precautions taken by their employer. • It is recognised that, a return to the workplace may result in anxiety returning to/maintaining work, particularly for those already known to have poor mental health. <p>People who are blind or partially sighted will have particular difficulty in returning to the workplace and will likely:</p> <ul style="list-style-type: none"> • have difficulty in identifying safety signs and floor markings; • have an increased risk of transmission of COVID due to the need to touch tactile signs, and other "landmarks" used to navigate around the workplace, unless enhanced hygiene measures are in place; • have difficulty in maintaining social distancing without support of another person who can identify whether they are maintaining the correct distance, whilst travelling to work on public transport, or in the workplace; • be at a higher risk of injury due to trip, fall or bumping into, screens or other safety measures. 	<p>home, or furloughed. However, from phase 2, this group will see a return to the workplace, where it is safe to do so. Where it is not safe to return to work immediately, workers may be able to remain furloughed for a period of time. Employers have been asked to comply with Fair Work policies.</p> <p>An employer must, by law, make reasonable adjustments for disabled people.⁷ This includes altering working conditions or hours in order to reduce the risk. They should demonstrate how they will do this through a risk assessment.</p> <p>Manufacturing Guidance will be revised to include a link to ACAS Coronavirus and Mental Health at Work webpages.</p> <p>Manufacturing Guidance has been revised to include a link to RNIB COVID-19 Employing a Partially Sighted or Blind Person webpages which includes a risk assessment tool.</p> <p>Guidance will be reviewed as more information on practicalities of this group returning to the workplace, and the impact of the guidance becomes known.</p> <p>Should an alternative format be requested, such as braille,</p>
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⁷ Equality Act 2010

	<p>The COVID-19 Manufacturing Guidance is currently not available in any format other than written English. This poses a risk that people with impaired sight or blindness are unable to access the content of the document, and could lead to unsafe working practices, localised transmission of the virus within a workplace and result in community transmission of the virus.</p>	<p>BSL, or a community language, this can be arranged through Scottish Government</p>
<p>Sex</p>	<p><u>Women</u> Women make up 23.4% of the manufacturing workforce.</p> <p>Women have bulk of caring and domestic work and will need to juggle this with any continued home working or when returning to the workplace⁸. The vast majority of lone parents are also women, and three-quarters of lone parent households were already financially vulnerable in 2016-18 (73%), and more likely than average to be in unmanageable debt.⁹</p> <ul style="list-style-type: none"> • Analysis by the ONS identified that women in the UK carry out on average 60% more unpaid work than men. • 6.9% of women in the manufacturing industry have children aged 16 or under. • Women spend far more time on childcare than men. 1 in 4 women across all age groups took part in childcare 	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.</p> <p>During Phase 1 of the Route Map, the majority of this group should be working from home - where the work can be done at home, or furloughed. However, from phase 2, this group will see a return to the workplace. Where women are unable to return to work immediately, workers may be able to remain furloughed for a period of time.</p>

⁸ Women spent far more time than men caring for children on average in 2014-15 ([Centre for Time Use Research: Time Use Survey 2014-15 Results for Scotland](#)) and were far more likely to be looking after the home or family in 2018 ([Scottish Household Survey 2018](#)). Time use data for Great Britain as a whole shows that although men are spending more time doing unpaid childcare in lockdown than they did in 2014-15, women continue to spend more time doing so ([Coronavirus and How People Spent their Time under Lockdown](#))

⁹ [Scottish Household Survey, 2018](#)

	<p>on a given day in 2014-15 (24%), compared to 15% of men¹⁰. Women may struggle to get childcare to allow them to return to the workplace and are more likely to take unpaid leave to care for others.</p> <ul style="list-style-type: none"> • Women earn less than men on average and are less likely to be eligible for sick pay. • Women are four times more likely to give up employment because of multiple caring responsibilities and are more likely to be in low-paid, part-time employment than male carers. • 19.5% of employed women (18+) earned less than the real Living Wage in 2019 – compared to 14% of men. • Women's overrepresentation as unpaid carers is likely to put them at higher risk of contracting COVID-19, which may result in a fall in earnings as well as serious health implications. • Their disproportionate shouldering of caring responsibilities may also make it harder to maintain or take on employment • Manufacturing work may have less flexibility than other work areas making it more difficult for women to return to work whilst schools and nurseries are closed. <p>-----</p> <p>Men: Many manufacturers employ a higher proportion of men, and men make up 76.6% of the manufacturing workforce.</p>	<p>Guidance will be reviewed as more evidence is received about the impact of the guidance on women returning to the workplace.</p> <p>-----</p> <p>SG have published the COVID-19 Manufacturing Guidance, Route Map,</p>
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¹⁰ [Household composition for specific groups of people in Scotland & Time Use Survey 2014-15](#)

	<p>20.7% of men have children aged 16 or younger, and a proportion of these men may also find it difficult to return to work due to childcare requirements.</p> <p>Men have higher prevalence of serious illness from COVID-19 (age standardised) and there is some evidence that younger men are less compliant with physical distance measures which could increase personal and community risk. Men may feel less confident about admitting that they are anxious about their safety at work.</p>	<p>Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.</p> <p>During Phase 1 of the Route Map, the majority of this group should be working from home - where the work can be done at home, or furloughed. However, from phase 2, this group will see a return to the workplace. Where men are unable to return to work immediately, workers may be able to remain furloughed for a period of time.</p>
<p>Pregnancy & maternity</p>	<p>23.4% of the workforce are women. This should result in a lower proportion of women being pregnant in the work place and resulting in a lower risk of direct transmission of the virus to pregnant women in the workplace.</p> <p>On the 16th March the UK government classed pregnant women, particularly those over 28 weeks, as 'vulnerable' to severe illness if infected with Covid-19¹¹. Official UK government advice is that all pregnant women should 'carefully' adhere to social distancing rules. There is limited evidence as to how the virus affects a growing foetus. Concerns from stakeholders remain as to how the virus affects the mother however we know that pregnancy weakens</p>	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.</p> <p>During Phase 1 of the Route Map, this group should have been working from home - where the work could be done at home, or furloughed, or on paid maternity leave. However, from phase 2, this group will see a return to the workplace. Where pregnant women are unable to return to work immediately, workers</p>

¹¹ [https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-](https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19)

	<p>the immune system and can make pregnant women more vulnerable to illness.</p> <p>Pregnant women or babies may be at risk of the virus being transmitted at home from a male who works in the manufacturing industry, should that person become infected.</p>	<p>may be able to remain furloughed for a period of time.</p> <p>An employer must, by law, make a workplace safe for a pregnant woman. This includes altering working conditions or hours in order to reduce the risk. They should demonstrate how they will do this through a risk assessment.</p> <p>Insufficient information of the impact of the guidance on pregnant women in the manufacturing industry and in the community, is available. Guidance will be reviewed as more evidence is received about on the numbers of pregnant women, the barriers they face on the return to work, and the effect of those on maternity leave.</p>
<p>Race</p>	<p>A high proportion of minority ethnic workers are key workers and already in the workplace. BME people make up a small proportion of manufacturing workers (2%).</p> <p>Pakistani and Bangladeshi workers have the lowest median hourly pay and are also the least likely to work from home in the UK, while in Scotland, African women were by far the most likely to be working in either caring, leisure and other service occupations or sales and customer service occupations, where homeworking may be much less feasible.</p> <p>Evidence shows that minority ethnic workers:</p> <ul style="list-style-type: none"> • are at a higher risk of serious illness or death if infected by 	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employers assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.</p> <p>During Phase 1 of the Route Map, this group should be working from home - where the work can be done at home, or furloughed. However, from phase 2, BME people will see a return to the workplace. Where this group are unable to return to work immediately, workers may be able to remain furloughed for a period of time.</p>

	<p>COVID-19. At-risk underlying health conditions are especially prevalent among some minority ethnic groups;</p> <ul style="list-style-type: none"> • are fearful of returning to work, even where the most stringent measures have been taken; • are fearful of the increased risk of fatality from the virus. <p>Due to the increased health risks related to infection, a return to the workplace may result in anxiety returning to/maintaining work, particularly for those already known to have poor mental health.</p> <p>BME workers are more likely to live in a mutli-generational household¹², increasing the risk of a transmission of the virus from the workplace to other BME people in their household.</p> <p>Poverty rates are higher for ethnic minority households so if they are still unable to return to work they could become more ncreasingly financially vulnerable.¹³</p> <p>The COVID-19 Manufacturing Guidance is currently not available in any format other than written English. This poses a risk that people whose first language is not English are unable to access the content of the document, and could lead to unsafe working practices, localised transmission of the</p>	<p>Manufacturing Guidance will be revised to include a link to ACAS Coronavirus and Mental Health at Work webpages</p> <p>Public Health Scotland will join a new expert group working with the Scottish Government to provide a clearer picture of how minority ethnic communities in Scotland are affected by COVID-19 – their findings will be used to identify any further measures that are required to protect this group.</p> <p>Guidance will be revised as more information is received on how the guidance impacts BME workers returning to the workplace.</p> <p>Should an alternative community language format be requested, this can be arranged through Scottish Government.</p>
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¹² Of those living in households, around 1 in 7 (15%) of people describing their ethnicity as Pakistani lived in a household with two or more families. This compared to only 1 in 50 (2%) of the population as a whole.

¹³ In 2014-19 the poverty rate was 39% for the 'Asian or Asian British' ethnic groups, and 38% for 'Mixed, Black or Black British and Other' ethnic groups compared to 25% for White 'Other' and 18% for White British ([Poverty and Income Inequality in Scotland 2016-19](#))

	virus within a workplace and result in community transmission of the virus.	
Religion and belief	<p>A small proportion of this group may require to undertake religious observance at certain times of the day. Safety measures in place, or lack of safe facilities, may impact their ability to observe prayers.</p> <p>Poverty rates are higher for certain religions (e.g. Muslim) so if employees are still unable to work they could be increasingly financially vulnerable.</p>	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.</p> <p>During Phase 1 of the Route Map, this group should be working from home - where the work can be done at home, or furloughed. However, from phase 2, this group will see a return to the workplace. Where this group are unable to return to work immediately, workers may be able to remain furloughed for a period of time.</p> <p>Guidance will be reviewed if more information is received about barriers to religious observance, and how the guidance will impact those who are financially vulnerable.</p>
Gender Reassignment	Evidence suggests that gender identity or transgender people are more likely to work in the public sector so will either be already working in key sectors or working from home. However we cannot discount that there may be a small minority of people in this group in the workplace.	SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.

		<p>During Phase 1 of the Route Map, this group should be working from home - where the work can be done at home, or furloughed. However, from phase 2, this group will see a return to the workplace. Where this group are unable to return to work immediately, workers may be able to remain furloughed for a period of time.</p> <p>Emerging data for Covid-19. Sectorial Safer Workplaces guidance will take account of new data and any more robust data.</p> <p>There is insufficient evidence to show if any members of this group are at a higher risk of serious illness if infected with COVID-19 whilst working in the manufacturing industry.</p> <p>Guidance will be reviewed as more evidence is received about the impact of the manufacturing guidance on transgender manufacturing workers is received.</p>
<p>Sexual orientation</p>	<p>Evidence suggests that LGBT people are more likely to work in the public sector so may either be already working in key sectors or working from home. However we cannot discount that there may be a small minority of people in this group in the workplace.</p>	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.</p> <p>During Phase 1 of the Route Map, this group should be working from home - where the work can be done at home, or</p>

		<p>furloughed. However, from phase 2, this group will see a return to the workplace. Where this group are unable to return to work immediately, workers may be able to remain furloughed for a period of time.</p> <p>There is no evidence to suggest that there are any differential barriers to this group. Guidance will be reviewed as more information regarding the impact of the guidance on non-hetero-sexual people in the manufacturing industry becomes known.</p>
<p>Marriage & Civil Partnership¹⁴</p>	<p>There is a theoretical possibility that couples who are married or are in a civil partnership may work for the same employer in the manufacturing industry. This may pose a risk of slight increase in a household transmission of the virus.</p> <p>Where there are children in the household, there may be increased difficulties in securing child care where both partners are expected to return to work at the same time.</p>	<p>SG have published the COVID-19 Manufacturing Guidance, Route Map, Workplace Risk Assessment Guidance and COVID-19 Occupational Risk Assessment. This guidance will assist employers and employees assess workplace risks and risks to individuals. Employers have been asked to comply with Fair Work policies.</p> <p>During Phase 1 of the Route Map, this group should be working from home - where the work can be done at home, or furloughed. However, from phase 2, this group will see a return to the workplace. Where this group are unable to return to work immediately, workers may be able to remain furloughed for a period of time</p> <p>Guidance will be reviewed as the impact of the guidance on married couples or couples in</p>

¹⁴ (the Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example HR policies and practices - refer to Definitions of Protected Characteristics document for details)

		<p>a civil partnership becomes known.</p> <p>Employers may allow one parent to return whilst one remains furloughed, or, where possible, split shifts to reduce the impact of childcare issues.</p>
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BACKGROUND

The [Coronavirus \(COVID-19\): Framework for Decision-Making](#) and [Scotland's Route Map through and out of the crisis](#) ("the Route Map"), along with the updates published on [28 May](#) and [18 June](#) make clear that COVID-19 is first and foremost a public health crisis and the measures to combat it have been necessary to save lives.

The *Framework for Decision-Making* identified four main categories of harm: direct health impacts, non-COVID-19 health harms, societal impacts and economic impacts. These harms are deeply inter-related: health harms impact on society and the economy, just as the societal and economic effects impact on people's physical and mental health and wellbeing. The Route Map sets out the range and phasing of measures proposed for Scotland as it moves out of lockdown. Like the initial response to the crisis, navigating the right course out of lockdown involves taking difficult decisions that seek to balance these inter-related harms and risks.

Recognising the extraordinary impact of the measures, Scottish Ministers have put in place a statutory requirement to review the restrictions every three weeks to ensure they remain proportionate and necessary. The *Framework for Decision Making* makes clear that these reviews will be informed by assessments of options for relaxation under their impact on the 'four harms', their viability, and broader considerations including impacts on poverty and equality and consideration of measures, for example, for specific geographies and sectors.

The Scottish Government considered from the outset whether the lockdown provisions were consistent with the Equality Act 2010 and also considered whether the provisions could constitute indirect discrimination. (The Act states that indirect discrimination occurs when a policy which applies in the same way for everybody has an effect which particularly disadvantages people with a protected characteristic, unless the person applying the policy can justify the differential treatment.)

Where potential indirect discrimination has been identified we are mindful that this must be a proportionate means of achieving a legitimate aim to comply with equality law. This will be kept under close review. While in many cases, the provisions have applied to all persons irrespective of protected characteristic, we recognise that not all people or communities are affected in the same way or to the same degree. Therefore the evidence we have gathered and ongoing dialogue with stakeholders, including equality stakeholders, will help to inform thinking as to how the proposals

may need to be adjusted to remove barriers or disadvantages for particular equality groups, to better advance equality; to foster good relations; or to reduce socio-economic disadvantage.

Scope of EQIA

The Scottish Government's Advanced Manufacturing team have completed this EQIA for the development of the [COVID-19 Manufacturing Guidance](#), to identify opportunities to boost equality and safe working across the manufacturing sector. This document is continuously being reviewed on a 3 weekly basis, as new data and opportunities emerge.

Specifically, the EQIA considers impacts on equalities groups based on the three tests it is required to address:

- Does this policy eliminate discrimination for each of the nine protected characteristics? If not is the discrimination justifiable? Can it be mitigated?
- Does this policy advance equality of opportunity between people who share a protected characteristic and those who do not?
- Does this policy foster good community relations between people who share a protected characteristic and those who do not?

The aim of publishing the COVID-19 Manufacturing Guidance for the manufacturing sector is to support restarting operations in a safe way that ensures physical distancing is adhered too, alongside enhanced hygiene and cleaning standards. The guidance has been developed in collaboration with business, trade unions and regulators who formed the Manufacturing Guidance group. It is a mixture of guidance and regulations, noting legal obligations under emergency coronavirus and Health & Safety legislation, and provides advice on the actions that businesses need to plan, prepare for and implement to create the conditions for safer workplaces during the current health crisis. It is a living document, subject to 3 weekly reviews in line with lockdown legislation

As part of the development of the Manufacturing Sector Guidance we are considering the impacts on different groups with protected characteristics under the Equalities Act 2010 in order to see if there are particular matters we should be taking into account. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The full EQIA for the manufacturing guidance is a strategy focused document which has been produced in consultation with the Manufacturing Guidance Working Group and stakeholder equality groups.

EVIDENCE

The headline data, engagement and information gathered to underpin this results EQIA includes:

Age

In a YouGov survey of adults in the UK, carried out on 13-20 April 2020, the percentage reporting that they were finding it difficult to stick to the social distancing rules decreased with age (from 18% of 18-24 year olds to 7% of those aged 65+). (Source - <https://www.gov.scot/publications/covid-19-health-and-social-impact-assessment/>).

Young people between the ages of 16-24 make up 11.4% of the manufacturing workforce. Most younger people face lower health risks from COVID-19 than the general population. It is important that guidance to support young workers during the pandemic is available, to provide employers and employees with the confidence that young people can work safely during the pandemic, and to encourage young people to take up, and continue with, available apprenticeship opportunities.

Evidence shows that the manufacturing sector has an aging workforce, with 36.5%¹⁵ of workers being in the 50+ age group. Older people are more likely to have underlying health conditions such as heart disease and diabetes, and ageing immune systems, and so the death rate from coronavirus increases substantially with age. It is important that people are reached with accurate and clear information on how to try and protect themselves from infection.

Disability

Disabled people are more likely to experience ill-health from contracting COVID-19 than the general population, due to higher prevalence of pre-existing health conditions and poorer overall health. There is evidence that disabled people, particularly those in the shielded category and those with existing mental health conditions, are anxious about the return to work.

11.6% of the manufacturing workforce have a disability, and 25.6%¹⁶ of the manufacturing workforce have undefined long term illnesses. Workers with a disability may find it more difficult to safely return to the workplace as a result of the introduction of workplace safety measures.

The [Royal Blind/Scottish War Blinded](#) charity have advised that partially sighted or blind workers are particularly at risk if enhanced hygiene measures are not in place, and unless support is available from another person to assist with physical distancing.

It is important that guidance which provides information on assessing and mitigating against the risk of transmission of the virus in the manufacturing sector is available to ensure that employers can identify the various needs of this group, and implement appropriate safety measures, through undertaking a robust risk assessment. This will provide employers and workers with the confidence that the workplace is safe.

Race

Existing social inequalities in the areas of poverty, health, housing and employment may mean that minority ethnic groups are disproportionately impacted by the

¹⁵ <https://www.gov.scot/publications/scotlands-labour-market-people-places-and-regions-background-tables/>

¹⁶ <https://www.gov.scot/publications/scotlands-labour-market-people-places-and-regions-background-tables/>

negative fall-out of this public health emergency. The best data on ethnicity is the 2011 Census but this is quite dated. The Scottish Household Survey in 2018, estimated that just over 11% of the population were ethnic minorities (6.6% were white non British; 2.8% Asian and 1.7% other). 2% of workers in the manufacturing sector are identified as being BME.

Public Health Scotland released preliminary analysis of COVID-19 and ethnicity data on 20 May. The analysis appears to show that there is not a higher level of COVID-19 cases than would be expected, given the size of our black, Asian and minority ethnic population¹⁷. However, it is crucial to note that the data is very limited. Additional analysis is being undertaken, and will be improved and updated as more data becomes available. (Source - <https://www.gov.scot/publications/covid-19-health-and-social-impact-assessment/>). The social impact of COVID-19 has been profound and extreme across every ethnic group particularly those in socio economic inequality. (source <https://bemis.org.uk/emnrrn/>)

The [Association for Black and Minority Ethnic Engineers](#) (AFBE-UK) have provided evidence that their BME members are fearful of returning to the workplace due to the increased risk of severe illness or fatality if they contract the virus.

Sex

Workers in the manufacturing sector are predominantly men (76.6%). Almost half of all women in Scotland (46.2%) work in public administration, education or health services, with 24% working in the manufacturing industry. Before the pandemic, 4.7%¹⁸ of workers in the manufacturing sector worked from home. Due to occupational segregation, it is likely that non-essential manufacturing office workers will be female, and make up a high proportion of these homeworkers.¹⁹

People outside the shielded group but with pre-existing health conditions, pregnant women or people with circumstances that mean they are at increased risk of severe illness from COVID-19²⁰ are required to follow enhanced social distancing. Women also make up a larger percentage of the population in Scotland living with a long-term health condition²¹.

However, death rates from COVID-19 are similar for men and women, and much higher for men when age differences are taken into account²².

(Source - <https://www.gov.scot/publications/covid-19-health-and-social-impact-assessment/>)

Socio-economic disadvantage

¹⁷ <https://beta.isdscotland.org/find-publications-and-data/population-health/covid-19/covid-19-statistical-report/20-may-2020/>

¹⁸ <https://www.gov.scot/publications/scotlands-labour-market-people-places-and-regions-background-tables/>

¹⁹ <https://www.gov.scot/publications/scotlands-labour-market-people-places-and-regions-background-tables/>

²⁰ [GOV.UK Guidance on protecting older people and vulnerable adults](#)

²¹ <https://www2.gov.scot/Topics/Statistics/Browse/Health/scottish-health-survey>

²² <https://www.nrscotland.gov.uk/files/statistics/covid19/covid-deaths-report-week-22.pdf>

Whilst this does not have its own distinct protected characteristic for the purposes of this EqIA, it has been identified that young people, women and black and minority ethnic people and people whose religion are at risk of socio-economic disadvantage.

Young people: Data from the Resolution Foundation states that more than one in three 18 to 24-year-olds are earning less than before the outbreak²³.

Women: APS shows that a total of 8.8% of the manufacturing workforce are part-time. This is not broken down to show the ratio of women who are part time, but as 41.1% of all women work part-time, compared to a total 12.4% of men, it is therefore likely a higher proportion of women work part time in the manufacturing industry than men. Women are more likely to lose their jobs in a post-COVID recession. (pre-COVID 95.8% of women in manufacturing had job security). It is anticipated that COVID-19 will therefore have a disproportionate impact on women²⁴

Race: Poverty rates are higher for ethnic minority households so if they are still unable to return to work they could become more increasingly financially vulnerable.²⁵

Religion and belief: Poverty rates are higher for certain religions (e.g. Muslim) so if employees are still unable to work they could be increasingly financially vulnerable.

RECOMMENDATIONS

To address the opportunities set out above the following actions should be considered/implemented:

Age

Through the combined use of the Scottish Government's [COVID-19 Manufacturing Guidance](#), [Operational Checklist](#), [Route Map](#), [Individual Workplace Risk Assessment Guidance](#) and the [COVID-19 Fair Work Statement](#), robust risk assessments will be carried out in collaboration between employers, employees, trade unions and other workplace representatives and health and safety representatives. This will help identify and mitigate against workplace and individual health risks, and will allow employees to confidently plan, prepare and implement the necessary safety measures to protect people with [protected characteristics](#) against the risk of transmission of the virus.

The safety measures taken in workplaces will mitigate against the risk of outbreaks in the workplace that could risk the health of older workers, and protect against the risk of wider community transmission to particularly vulnerable 70+ age group. People in the 50+ age group will be more confident about returning to a safe workplace.

²³ <https://www.resolutionfoundation.org/publications/young-workers-in-the-coronavirus-crisis/>

²⁴ <https://www.engender.org.uk/content/publications/Engender-Briefing---Women-and-COVID-19.pdf>

²⁵ In 2014-19 the poverty rate was 39% for the 'Asian or Asian British' ethnic groups, and 38% for 'Mixed, Black or Black British and Other' ethnic groups compared to 25% for White 'Other' and 18% for White British ([Poverty and Income Inequality in Scotland 2016-19](#))

Confidence in the ability for young people to safely enter into, or continue with, apprenticeships will be restored.

Following the guidance, carrying out appropriate risk assessments, and making adjustments to the workplace, will result in an increased understanding of the challenges and barriers faced by workers of different ages in the workplace during the pandemic, and help foster good relations and equal opportunities.

Disability

Through the combined use of the Scottish Government's [COVID-19 Manufacturing Guidance](#), [Operational Checklist](#), [Route Map](#), [Individual Workplace Risk Assessment Guidance](#) and the [COVID-19 Fair Work Statement](#), robust risk assessments will be carried out in collaboration between employers, employees, trade unions and other workplace representatives and health and safety representatives. This will help identify and mitigate against workplace and individual health risks, and will allow employees to confidently plan, prepare and implement the necessary safety measures to protect people with [protected characteristics](#) against the risk of transmission of the virus.

The safety measures taken in workplaces will mitigate against the risk of outbreaks in the workplace that could risk the health of disabled workers and workers with underlying illnesses that make them more vulnerable to severe illness or fatality; and protect against the risk of wider community transmission to disabled and vulnerable people not in the workplace. People in this group will be more confident about returning to a safe workplace.

Where requested, a copy of the COVID-19 Manufacturing Guidance and Operational Checklist will be translated into the appropriate format and provided by the Scottish Government on request.

Following the guidance, carrying out appropriate risk assessments, and making adjustments to the workplace, will result in an increased understanding of the challenges and barriers faced by disabled workers during the pandemic, and help foster good relations and equal opportunities.

Race

Through the combined use of the Scottish Government's [COVID-19 Manufacturing Guidance](#), [Operational Checklist](#), [Route Map](#), [Individual Workplace Risk Assessment Guidance](#) and the [COVID-19 Fair Work Statement](#), robust risk assessments will be carried out in collaboration between employers, employees, trade unions and other workplace representatives and health and safety representatives. This will help identify and mitigate against workplace and individual health risks, and will allow employees to confidently plan, prepare and implement the necessary safety measures to protect people with [protected characteristics](#) against the risk of transmission of the virus.

The safety measures taken in workplaces will mitigate against the risk of outbreaks in the workplace that could risk the health of black and minority ethnic workers, particularly those who already have underlying illnesses that make them more vulnerable to severe illness or fatality; and protect against the risk of wider

community transmission to the wider black and minority ethnic community who are not in the workplace. People in this group will be more confident about returning to a safe workplace.

Where requested, a copy of the COVID-19 Manufacturing Guidance and Operational Checklist will be translated into the required community language and provided by the Scottish Government on request.

Following the guidance, carrying out appropriate risk assessments, and making adjustments to the workplace, will result in an increased understanding of the challenges and barriers faced by black and minority ethnic workers during the pandemic, and help foster good relations and equal opportunities

Sex

Through the combined use of the Scottish Government's [COVID-19 Manufacturing Guidance](#), [Operational Checklist](#), [Route Map](#), [Individual Workplace Risk Assessment Guidance](#) and the [COVID-19 Fair Work Statement](#), robust risk assessments will be carried out in collaboration between employers, employees, trade unions and other workplace representatives and health and safety representatives. This will help identify and mitigate against workplace and individual health risks, and will allow employees to confidently plan, prepare and implement the necessary safety measures to protect people with [protected characteristics](#) against the risk of transmission of the virus.

Safe workplaces will allow women to return to work, protecting their jobs.

Following the guidance, carrying out appropriate risk assessments, and making adjustments to the workplace, will result in an increased understanding of the challenges and barriers faced by different sexes during the pandemic, and help foster good relations and equal opportunities

Socio-economic disadvantage

Through the combined use of the Scottish Government's [COVID-19 Manufacturing Guidance](#), [Operational Checklist](#), [Route Map](#), [Individual Workplace Risk Assessment Guidance](#) and the [COVID-19 Fair Work Statement](#), robust risk assessments will be carried out in collaboration between employers, employees, trade unions and other workplace representatives and health and safety representatives. This will help identify and mitigate against workplace and individual health risks, and will allow employees to confidently plan, prepare and implement the necessary safety measures to protect people with [protected characteristics](#) against the risk of transmission of the virus.

Workers who have been furloughed will be able to return to a safe workplace and their earned income be restored.

Following the guidance, carrying out appropriate risk assessments, and making adjustments to the workplace, will result in an increased understanding of the challenges and barriers faced by low skilled, low paid workers who are at socio-economic disadvantage, or who may become socio-economically disadvantaged as

a direct result of the pandemic, and help foster good relations and equal opportunities

MONITORING, EVALUATION AND LESSONS AND LEARNING

New evidence is continually being produced and this evidence, alongside the views of partners in the public, private and third sector and the views of Scottish citizens will be important in identifying and taking the next steps.

The Scottish Government would welcome your views and evidence and would be happy to have discussions with representative organisations to see whether any further opportunities to increase equality can be identified.

This EQIA will remain live after publication and will be continuously reviewed as we progress through the route map. Updated versions are available on request by contacting midamp@gov.scot

The actions set out in this EQIA will be evaluated as part of the wider evaluation of the Scottish Government's overarching Equalities Impact Assessment (EQIA) for the development of sectoral guidance as a whole.

The guidance will be reviewed and updated on a regular basis in line with the regular three weekly review of lockdown requirements.



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