

# **Workplace Adjustments On-boarding Process - EQIA**

**June 2022**

# Equality Impact Assessment record

Title of policy/ practice/ strategy/ legislation etc.	Workplace Adjustments during On-Boarding	
Minister	PD – Perm Sec	
Lead official	Lynne Allan	
Officials involved in the EQIA	name	team
	Susie Macdonald  Anna Winters, Mark Dorrian, Fay Meharry and Lynne Allan	WAS Project Team  WAS/Comms
Directorate: Division: Team	People Directorate, People Advice, Workplace Adjustment Project Team	
Is this new policy or revision to an existing policy?	Revision to existing practices to create a new process	

## Screening

### Policy Aim

Describe in this paragraph what the purpose of your policy/strategy/plan is and its desired outcomes and to which National Outcome(s) it contributes.

### National outcomes:

- Fair Work and Business: We have thriving and innovative businesses, with quality jobs and fair work for everyone<sup>1</sup>
- Human Rights: we respect, protect and fulfil human rights and live free from discrimination

### Scottish Government Equality Outcomes:

### Copy 2 outcomes

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<sup>1</sup> Vision: We successfully attract and retain new talent and fully support business and social enterprise. Our achievements are underpinned by a strong culture of research, innovation and development. We take seriously the wellbeing and skills of our workforce and provide good quality, fair work, training and employment support for all. Employers actively fulfil their corporate responsibilities.(Indicator of reducing inequalities)

A workplace adjustment<sup>2</sup> is a change to a work process, practice, procedure or environment that enables an employee to perform their job in a way that minimises the impact of their impairment, condition or personal circumstances and removes the barriers that increase that impact. Conditions (relating to disability legislation) include physical, neurological, cognitive and mental conditions. A workplace adjustment goes beyond the legal requirement of 'reasonable adjustment' – what an employer must do under Equality Legislation, and instead focusses on the aspiration of the employer we want to be – looking at what can be done rather than just what must be done.

In taking this broader approach adjustments can also be needed for conditions that may not be classified as a disability, such as a time limited health condition (e.g. sprained wrist, broken bone), caring responsibilities, religious observance or as adjustments for trans people.

The focus of this EQIA is new starts and in particular, onboarding: the process between accepting a job offer (having been successful at interview) and starting the job, until the person's adjustments are in place. This is detailed below.

In progressing its Equality Outcomes the Scottish Government has made a commitment to empower disabled employees to realise their potential in the workplace, removing unnecessary barriers to recruitment, retention and progression. The Recruitment and Retention Plan for Disabled People 2019 (DRRAP) sets a target of 25% of external recruitment of disabled people over the next seven years.

The plan sets out the actions we will take as an employer to support more disabled people into work in Scottish Government and to enable existing disabled employees to thrive and succeed at work.

The anticipated outcomes for the project align with the desired outcomes of the DRRAP to:

- Create an accessible workplace where everyone can perform without barriers
- Have corporate policies and practices that work well, and work well together, to enable disabled people to thrive at work.

One of the commitments to support this outcome was to consider and take forward the findings of the Scottish Government: Reasonable Adjustments

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<sup>2</sup> The Scottish Government is deliberately taking an approach that goes beyond public sector equality duties and using 'workplace adjustments' instead of 'reasonable adjustments'. The reasonable adjustments duty was first introduced under the Disability Discrimination Act 1995. The reasonable adjustments duty under the Equality Act (2010) operates slightly differently but the object is the same: to avoid as far as possible by reasonable means the disadvantage a person experiences because of their disability. Employers have a duty to take steps to remove, reduce or prevent the obstacles people face as workers or job applicants with a disability, where it's reasonable to do so.

Discovery report published December 2018 and conducted by Storm ID to review and propose a revised approach for delivering a workplace adjustments service.

The workplace adjustments project team is delivering a project that will streamline the process of arranging adjustments for current and new employees. This current workstream will review the current approach to onboarding new candidates by the Scottish Government to ensure that their needs are identified at an early stage before they begin their new role and the right support or equipment is put in place to enable them to perform their role safely and well.

NB: This project pilots one element of the improved service – taking an agile approach to developing and extending the new service on an iterative basis.

Who will it affect?

- New Scottish Government employees with a health condition, disability or who request an adjustment.

It will impact on new employees who have identified a health condition on their application form, and have passed the interview stage and are going through pre-employment checks. The process will introduce a new element as the candidate will be contacted in the first place by the workplace adjustment project team (WAS).

The WAS team is piloting provision of a single point of contact for each new employee and recruiting managers to provide specialist support efficiently and effectively. The project team will liaise with any/all other contacts within SG or outside the organisation, acting as a conduit and enabling adjustments to be made to a set timescale. Most importantly, the approach will put the member of staff at the centre of the process and improve communication with them and their line manager.

- Line managers recruiting new staff who may need an adjustment. The project will ensure that line managers have the appropriate support and guidance to make and review adjustments. And with the employees consent, shares the impact of their circumstances on how they work. It will awareness and understanding of line managers of how best to support their staff member.
- It will also impact on a range of SG teams who will benefit from the efficiencies delivered by a dedicated team coordinating effort – such as HR Wellbeing teams, Resourcing teams Occupational Health and Safety, iTECS

What might prevent the desired outcomes being achieved?

- Breakdown in communications between the candidate and SG teams. If the candidate is not asked or feel able to let SG teams know about their needs.
- Non-disclosure by new employees of their workplace adjustment needs at an early stage because of lack of trust in managers or HR services and/or a perception that disclosure may have a negative effect on their being offered a job. In this case an adjustment would not be identified until they have started in post, causing a delay.
- Non-disclosure by new employees of their workplace adjustment needs at an early stage because they don't realise they will need one. This delays identifying an adjustment until they have started in post, causing a delay.
- Breakdown in communication between SG teams. SG teams not sharing the right information at the right time and/or missing out a team (for example not ensuring the relevant IT software or equipment is sourced).
- Unclear or ambiguous guidance for staff, meaning that opportunities to join up the services are missed.
- Disjointed or complex processes.
- Resistance from or lack of understanding by line managers. Line managers may not feel that a person's adjustments make them suitable for the post or be aware of our equality duties.
- Supplier issues. We are unable to access suitable equipment in time.
- Costs/financial ownership. Disagreements over which team is responsible for paying for adjustments. Funding for a new dedicated team within an environment seeking for financial savings.
- Lack of ownership or lines of responsibility between teams  
Where teams do not consider that they are responsible for accessing equipment or making the right connections between teams.
- Accessibility issues. Including, but not only, physical accessibility (to a building or office); could also include accessible information because it is provided in an inaccessible format.
- Security Constraints. In order to access equipment or software for adjustments in time, we need to order some items in advance of the person being set up on the payroll.

- Insufficient record keeping. Where information to enable someone to access their adjustments is not kept in a central location.
- Lack of confidence in disclosing diversity information. New employees may feel nervous or mistrustful that if they disclose the information, they may be discriminated against.

## Stage 1: Framing

### Results of framing exercise

This process reviews a range of an existing practices and synchronises them into one new process. The SG has a duty of care to all candidates and employees to ensure they are treated fairly when applying for roles and throughout their career. The SG has employer duties under the Equality Act 2010, which legally protects people from discrimination in the workplace and in wider society. Work has been undertaken through the SG Equality Strategy and DRRAP to inform the new process which will provide an enhanced experience for candidates and employees when joining the organisation.

The project reviews the current approaches from the perspective of the user/candidate to ensure it will better meet the needs of the user when they wish to request a workplace adjustment when joining the Scottish Government.

It takes account of the needs of managers where they need to arrange a workplace adjustment for their staff, and deliver better efficiency in meeting the needs of the business, removing barriers and optimising opportunity for performance.

User research tells us that there are high levels of dissatisfaction with the consistency of our existing processes, available accessible information and delays in resolving issues. The project also seeks to drive efficiency and effectiveness, internally to meet users' needs, through technology and systems enhancement by providing a single entry point, end to end process for requesting, categorising, ordering, arranging and delivering workplace adjustments which are properly maintained and reviewed.

From our engagement work in developing the DRRAP we learned that many new employees shared a frustration with the time taken to put workplace adjustments in place.

There is currently no written procedure between recruiting manager, HR staff, the individual and those areas of Scottish Government that put WAS in place.

Currently, when an adjustment is identified on an Occupational Health Form during pre employment checks, it is not actioned until the person's start date has been negotiated. With adjustments requiring a longer lead in time, this

often means either a delay to a person starting work or starting work without the required adjustments in place.

The Workplace Adjustments (WAS) project team is piloting provision of a single point of contact for each new employee and recruiting managers to provide specialist support efficiently and effectively. The project team will liaise with any/all other contacts within SG or outside the organisation, acting as a conduit and enabling adjustments to be made to a set timescale. Most importantly, the approach will put the member of staff at the centre of the process and improve communication with them and their line manager.

The team will set up a central record of adjustments for the employee, forming part of their individual HR record. That record will detail adjustments needed which will improve how we manage cases, better inform line managers and ensure a streamlined approach to providing adjustments when the individual moves to different roles.

The new service will also:

- The process will enable a smooth transition for new employees into the organisation and throughout their career
- It will improve the consistency of user experience and the wellbeing of all staff
- It will improve operational efficiency and reduce timescales in delivery
- It will enhance access to direct support for those requiring workplace adjustments
- It will enhance awareness and confidence for line managers in meeting the needs of staff who require workplace adjustments
- It will improve accessibility and availability of information and guidance
- It will ensure that managers are well informed in relation to the implementation of workplace adjustments
- It will inform the SG employer narrative as a leading Fair Work employer

## **On-boarding – organisational process**

Storm ID were commissioned to produce a report in 2018 with the following objective: through the successful evaluation of current services, and the discovery of evidenced user insights; ensure that Scottish Government has the knowledge it needs to empower disabled employees, removing unnecessary barriers to their recruitment, retention and progression whether they have declared a need or not - while achieving organisational objectives and fulfilling its legal obligations.

Storm ID report findings for onboarding: relevant steps are 4 and 5 (referred to as 1 and 2 in the evidence section).

## 'As is' user journey 1: Pre-employment



### Extent/Level of EQIA required

A full EQIA is required with the focus on adjustments (health conditions/disability), mainly using corporate information. It details a new process which seeks to enable workplace adjustments for employees at the onboarding stage of recruitment, and onwards throughout the employee's career. This EQIA links to and will inform additional EQIAs relating to the recruitment of employees, and also the upcoming Employee Passport<sup>3</sup>.

<sup>A</sup> An employee passport<sup>3</sup> will allow an individual to be able to access through their account and transfer their workplace adjustment data, requirements and where possible equipment with them when they move post internally and facilitate conversations with new managers as part of that process



## Stage 2: Data and evidence gathering, involvement and consultation

Include here the results of your evidence gathering (including framing exercise), including qualitative and quantitative data and the source of that information, whether national statistics, surveys or consultations with relevant equality groups.

Characteristic <sup>4</sup>	Evidence gathered and Strength/quality of evidence	Source	Data gaps identified and action taken
AGE	<p>Age is relevant to this EQIA because people at any age can require a workplace adjustment, and some age groups are more likely to require an adjustment or have a condition that can affect their likelihood of finding employment. While this EQIA will not impact on employment as such, the onboarding process should ensure that requesting an adjustment does not impact negatively on a new employee's experience of the Scottish Government and if detrimental, may affect their longer term health and employment outcomes.</p> <p>Young people are more likely to be unemployed, and this figure is higher if they have a disability. Disabled people aged 16 to 24 had the lowest employment rate at 35.8%. Non-disabled people aged 16 to 24 also had the lowest employment rate at 60.8% but this was still higher than the employment rate for any disabled age groups.</p> <p>Disabled people aged 35 to 49 had the highest employment rate at 52.7% but lower than 91.0% of non-disabled people in the same age group.</p> <ul style="list-style-type: none"> <li>In 2018/19, the participation rate for young people (aged 16-19) who identified as disabled was 87.0% compared to 91.8% for those who did not identify as disabled.</li> <li>The participation rate has increased over the past four years for young people (aged 16-19) who identified as disabled.</li> </ul>	<p>Source: <a href="#"><u>Disabled people in the labour market in Scotland 2018</u></a> (Published: February 2020)</p>	<p>We will seek views on the experiences of new employees with health conditions in different age groups through networks, trade unions and other forms of engagement as well as drawing on performance data throughout the project and</p>

<sup>4</sup> Refer to Definitions of Protected Characteristics document for information on the characteristics

SG has two programmes specifically aimed at encouraging young people into the workplace: the Modern Apprenticeship (MAP) and Graduate Development (GDP) programmes. The GDP put specific support into place for its disabled interns and provided a one to one full time service which has provided learning for this project.

**SG Distribution of age group – trend – June 2020**

	16-29	30-39	40-49	50-54	55-59	60+
June 2018	15%	25%	27%	16%	11%	6%
June 2019	17%	25%	27%	14%	11%	6%
September 2019	17%	25%	27%	14%	11%	6%
December 2019	17%	25%	27%	14%	11%	6%
March 2020	18%	25%	27%	14%	11%	6%
June 2020	17%	25%	27%	14%	11%	6%

External Source: Annual Participation Measure for 16 – 19 year olds in Scotland 2019 (Published: August 2019, Skills Development Scotland (SDS))

information provided by central analytical services team (CAST).

We will continue to improve the evidence base for this project and seek continuous feedback from users.

<p><b>DISABILITY</b></p>	<p>This project came about because the Scottish Government recognises that we need to improve the experiences of our existing and potential staff with disabilities. We have drawn on specific research to explore those experiences for this project.</p> <ul style="list-style-type: none"> <li>• in 2018, the employment rate for disabled people in Scotland (aged 16-64) was 45.6%, which compares with an employment rate of 81.1% for non-disabled people.</li> <li>• the employment gap between disabled and non-disabled people decreased to 35.5 percentage points from 35.9 percentage points in 2017.</li> <li>• the unemployment rate for disabled people (aged 16-64) in Scotland was 9.4% in 2018, compared with an unemployment rate of 3.6% for non-disabled people.</li> <li>• in 2018, almost half of disabled people (16-64 years) in Scotland were economically inactive (49.7%), compared with 15.9% of non-disabled people.</li> <li>• 26.3% of economically inactive disabled people wanted to work, higher than 16.9% of economically inactive non-disabled people.</li> </ul> <p>Disabled staff increasingly comprise more of the Scottish Government's workforce</p> <p>In 2020 the Scottish Government workforce was made up of:</p> <ul style="list-style-type: none"> <li>• 8% have declared at least one disability</li> <li>• 48.9% were non-disabled</li> <li>• For 43.6% it's not known whether they had a disability</li> </ul> <p>Between 2013 and 2020:</p> <ul style="list-style-type: none"> <li>• Disabled people increasingly comprise more of the organisation's workforce: increasing from 4.0% to 7.6%</li> <li>• Declaration rates have increased from 61.2% to 66%</li> </ul>	<p>Source: <a href="#"><u>Disabled people in the labour market in Scotland 2018</u></a> (Published: February 2020)</p> <p>Source: <a href="#"><u>Equality Outcomes and Mainstreaming Report 2019</u></a> (Last updated: April 2019)</p> <p>CAST Diversity Pack June 2020</p>	<p>The project is based on evidence from staff with disabilities.</p> <p>We will continue to improve the evidence base for this project and seek continuous feedback from users.</p> <p>We are members of the Business Disability Forum and UK wide government workplace adjustments forum and will continue to refer to learning from them.</p>
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	<p>We also have a disability internship scheme run in partnership with Inclusion Scotland. This project aims to increase the number of disabled people in the Scottish Government and better retain them as members of staff by meeting their adjustment needs when we employ people. The main source of evidence for this impact assessment is the Storm ID report sections about the onboarding process.</p> <p><b>SG Core permanent &amp; FTA staff</b></p> <ul style="list-style-type: none"> <li>• Storm ID were commissioned to produce a report in 2018 with the following objective: through the successful evaluation of current services, and the discovery of evidenced user insights; ensure that Scottish Government has the knowledge it needs to empower disabled employees, removing unnecessary barriers to their recruitment, retention and progression whether they have declared a need or not - while achieving organisational objectives and fulfilling its legal obligations.</li> <li>• A total of 76 participants were involved in this research. We had 28 screener survey respondents. Among them, 26 participants attended both interviews and workshops.</li> <li>• We had 35 SG-wide survey respondents, among whom two of them volunteered to attend workshops and the rest of them were anonymous.</li> <li>• A total of 30 participants were interviewed and a total of 22 participants attended the workshops. Of them, 11 participants participated in both interviews and workshops.</li> <li>• By and large, people have had negative experiences of having dealt with the reasonable adjustments process within SG. Below is the number of participants categorised with the different types of experiences: <ul style="list-style-type: none"> <li>○ Negative experience – 20 participants</li> <li>○ Positive experience – 12 participants</li> <li>○ Mixed experience – 8 participants</li> <li>○ Neutral experience – 7 participants</li> </ul> </li> </ul> <p>Note: This data was not captured for 29 participants, as they did not take the screener survey nor the SG-wide survey.</p>	<p>Source: Storm ID Report June 2018</p>	<p>Non-disclosure rates are high. Work by D&amp;I team to increase confidence in completing diversity information. Specific work during induction to encourage new employees to complete diversity information as part of induction.</p>
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- A total of 19 participants self-identified as having the following types of impairments. Note that this research involved approximately 10% of the self-declared disabled staff (SG Core permanent and FTA).
- While the participants were asked about the following conditions, the numbers cannot be disclosed for data protection reasons:
  - Physical impairment - one or more physical impairments such as Psoriatic Arthritis, Hyper Mobility, Dispraxia, Visual impairment, Osteo Arthritis and Fybromyalgia. One other participant had both physical and cognitive impairments. Physical and neurological impairments.
  - Cognitive impairment, Dyslexia or Heightened Sensory issues or both cognitive and neurological impairments.
  - Neurological impairment, Neurological dizziness, Multiple Sclerosis or a Neurological condition.
  - Mental impairment, Obsessive Compulsive Disorder, Anxiety or Asperger's Syndrome or both cognitive and neurological conditions.
  - Cognitive and physical conditions.
  - Neurological and physical conditions.

The onboarding process is described in the previous section. User experience is described as follows:

**Step 1: Discuss adjustments for job offer (start of onboarding)**

- If an job offer is made and a candidate accepts it, they're generally not kept in the communication loop about decisions on adjustments. They're left unsure about whether the adjustments will be ready by the first day of job.
- HR can't initiate the process to deliver adjustments until a job offer is accepted, then the Pay has to be setup, followed by Scots account needing to be setup. It's only after these steps that HR can get in touch with Optima who provide Occupational Health Service.
- A person from Optima then gets in touch with the candidate and arranges an assessment (either on phone or in-person). They then generate a report and

	<p>recommendations for what adjustments need to be given. HR stays in the loop during this time.</p> <ul style="list-style-type: none"> <li>• Optima’s recommendations are not often seen as being useful because those recommendations don’t quite fit into SG’s framework around IT and security. Some recommendations are changed by the teams within SG to deliver within the framework of possibilities. This doesn’t always result in the adjustments working well for the end users.</li> <li>• Depending on what the recommendations are, they go to: <ul style="list-style-type: none"> <li>○ Occupational Health and Safety Branch – to deliver hardware</li> <li>○ ITECS – to deliver software</li> <li>○ Anybody else responsible for delivering adjustments to the space – seating, lighting etc. for a team. There isn’t a definite ‘go to’ person for this.</li> </ul> </li> <li>• Barriers</li> <li>• Not being in the loop of communication about the workplace adjustments they require</li> <li>• The links are broken between HR, Occupational Health survey data and line manager.</li> <li>• eHR system (internal HR system) limits only 80 people per month to be processed for payroll. This has been causing a backlog of people waiting and delay in people getting adjustments ready by the time they start work.</li> <li>• “The recruitment process asks for reasonable adjustments, only for the interview. They need to change it to ‘for employment’ considerations.” P16, Line manager and staff who delivers adjustments</li> </ul> <p><b>Step 2: start job</b> Organisational process</p> <ul style="list-style-type: none"> <li>• The first day of job can occur any time after the Payroll gets setup. There is no consistency and assurance that adjustments will be put into place by start date of the job. The end user who needs adjustments needs to be persistent and chase up a lot in many cases even after starting employment.</li> </ul>		
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Barriers

	<ul style="list-style-type: none"> <li>• Not comfortable talking about their impairment with line manager</li> <li>• Negative experience of getting workplace adjustments with previous employer</li> <li>• The information on impairment shared on the form at application stage is not always being taken on board into employment phase</li> <li>• No awareness of the term 'Reasonable adjustments'</li> <li>• No useful information on workplace adjustments on Saltire</li> <li>• Don't know who to contact to discuss their impairment and adjustments</li> <li>• A few of them don't have a line manager and they don't know who to go to</li> <li>• Don't know the process to go about for requesting workplace adjustments</li> <li>• Can't bring their own hardware or equipment into SG for work, even if they already have it and know it works well for them</li> <li>• Not always kept in the loop, so they don't know what's happening with their request for adjustments</li> </ul> <ul style="list-style-type: none"> <li>• Waiting times are too long and it affects their performance (affects confidence and ability)</li> <li>• Having to talk to too many people in the process of getting adjustments makes them feel vulnerable</li> <li>• Having to go through a new assessment</li> </ul> <p>Opportunities</p> <ul style="list-style-type: none"> <li>• Create awareness about impairments and adjustments</li> <li>• Design a meaningful and actionable step-by-step guidance on Saltire</li> <li>• Have a specialist team responsible for delivering adjustments. They would be the 'go to' contacts for adjustments.</li> </ul> <p>Quotes</p> <ul style="list-style-type: none"> <li>• "When I arrived at the first day of my job, I was surprised adjustments were not already in place. I was given a temporary fix (not ideal) until all the adjustments arrived 6 weeks later. It was frustrating and very stressful. It was difficult to do my work." P19, End user, Fair Work</li> <li>• "I think the People Advice and Wellbeing team is responsible for ensuring that new recruits have their necessary RAs in place by their start date. We don't know how</li> </ul>		
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	<p>many of new recruits on an average need RAs in place by their start date.” P21, Line manager and staff who deliver adjustments</p> <p>Outcomes</p> <ul style="list-style-type: none"> <li>• The end result is a hit or a miss. There are inconsistencies and there are breakdowns between stages and different individuals or teams involved.</li> <li>• Many end users have been disappointed because of adjustments not put into place for interviews or because they didn't work well for them. For many of those interview candidates who need adjustments and proceed into employment, adjustments were not put into place until 4-6 weeks after starting the job. During this time, they were unable to perform their work well and it brought down their confidence and productivity, resulting in a negative experience.</li> </ul> <p><b>COVID 19 - WORKING FROM HOME: IMPACTS</b> The Scottish Government's internal statistics show that 66%<sup>5</sup> of staff have shared information about their disability status. Key issues for People Directorate during the initial Covid-19 period have been around the need for workplace adjustments to translate into the home environment and the increased demand for support for mental health and wellbeing.</p> <p>Workplace adjustments There have been concerns around the provision of workplace adjustments at home, and issues around the accessibility of online platforms and virtual ways of working. A UK Government report highlights that whilst workplace adjustments are a high priority and efforts have been positively recognised, some disabled staff do not feel that there has been sufficient rapid support given the scale of the challenge. The paper also highlights that some disabled staff may be anxious if they need to provide pre-payment for equipment ahead of claiming this back.</p> <p>Benefits noticed</p>		
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<sup>5</sup> 8% of staff have self-declared disabled (that includes unknowns) and when unknowns are taken out that rises to 13%: CAST figures: December 2019



Structural and cultural benefits are being noticed for disabled colleagues in the growing normalisation of the provision of working from home, and improvements in providing workplace adjustments and equipment to colleagues during this period. The slower pace of life and less sensory activity can particularly benefit those with neurodiversity.

According to the UKG's report the experiences of disabled staff shows there are real opportunities for increasing the sense of belonging and community. Practices being put in place to support teams working remotely (such as daily check ins), can mean that individuals who usually feel quite isolated from their teams are suddenly feeling more included. Those who have been used to working in the office are reporting an increased sense of empathy and understanding and a desire to capture and learn from this over the longer term.

#### Support for mental health and wellbeing

There has been a high level of attention to and support for mental health and wellbeing across the Civil Service. This has included regular communication of additional support by HR teams. This is generally welcomed by staff, although the UKG's report flags up that staff can feel overwhelmed at the amount of material and guidance emerging and there is a desire for clear, simple pathways for individuals. There is recognition too that where Mental Health First Aiders are experiencing high demand support should be put in place for their own mental health.

#### **Longer term concerns**

The UKG report mentions the secondary impacts of the response to the pandemic that will become increasingly evident over time. These include labour market contractions, challenges in access to healthcare, difficulties in access to support and services during the crisis by disabled colleagues. This could affect entry for disabled people into the Civil Service with issues for existing disabled staff around morale and wellbeing, and retention and career development.

	<p><b>SG Distribution of disability status – trend</b></p> <table border="1" data-bbox="383 228 1447 595"> <thead> <tr> <th></th> <th>Disabled</th> <th>Not disabled</th> <th>Prefer not to say</th> <th>Unknown</th> </tr> </thead> <tbody> <tr> <td>June 2018</td> <td>7%</td> <td>54%</td> <td>1%</td> <td>38%</td> </tr> <tr> <td>June 2019</td> <td>8%</td> <td>54%</td> <td>1%</td> <td>37%</td> </tr> <tr> <td>September 2019</td> <td>8%</td> <td>55%</td> <td>1%</td> <td>35%</td> </tr> <tr> <td>December 2019</td> <td>8%</td> <td>56%</td> <td>1%</td> <td>34%</td> </tr> <tr> <td>March 2020</td> <td>8%</td> <td>56%</td> <td>2%</td> <td>34%</td> </tr> <tr> <td>June 2020</td> <td>8%</td> <td>56%</td> <td>2%</td> <td>34%</td> </tr> </tbody> </table>		Disabled	Not disabled	Prefer not to say	Unknown	June 2018	7%	54%	1%	38%	June 2019	8%	54%	1%	37%	September 2019	8%	55%	1%	35%	December 2019	8%	56%	1%	34%	March 2020	8%	56%	2%	34%	June 2020	8%	56%	2%	34%	<p>Source: SG CAST July 2019</p>	
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<p><b>SEX</b></p>	<p>In 2018, the employment gap between disabled and non-disabled people was wider for men (40.0 percentage points compared with 31.1 percentage points for women).</p> <p>The SG workforce is made up of 58% women and 46% men. There are more women with disabilities (15%) than men (12%).</p>	<p>Source: <u>Disabled people in the labour market in Scotland 2018</u> (Published: February 2020)</p> <p>Source: Scottish Government People Survey Gender pack (2019)</p>	<p>We will seek views on the experiences of new employees through networks, trade unions and other forms of engagement as well as drawing information provided by central analytical services</p>																																			

	<p><b>SG Distribution of gender within pay band - June 2020</b></p> <table border="1" data-bbox="383 300 1088 667"> <thead> <tr> <th></th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr> <td>Band A</td> <td>60%</td> <td>40%</td> </tr> <tr> <td>Band B</td> <td>54%</td> <td>46%</td> </tr> <tr> <td>Band C</td> <td>56%</td> <td>44%</td> </tr> <tr> <td>Not Assim</td> <td>11%</td> <td>89%</td> </tr> <tr> <td>SCS</td> <td>43%</td> <td>57%</td> </tr> </tbody> </table>		Female	Male	Band A	60%	40%	Band B	54%	46%	Band C	56%	44%	Not Assim	11%	89%	SCS	43%	57%	<p>Source: SG Equality Mainstream Report 2019</p>	<p>team (CAST).  We will continue to improve the evidence base for this project and seek continuous feedback from users.</p>
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Band C	56%	44%																			
Not Assim	11%	89%																			
SCS	43%	57%																			
<p><b>PREGNANCY AND MATERNITY</b></p>	<p>Evidence gap –pregnant women joining the organisation may have a disability or health condition requiring an adjustment.</p> <ul style="list-style-type: none"> <li>• A higher percentage of women report having childcare responsibilities at A3, A4, B1, and C1 grades.</li> <li>• A higher percentage of men report having childcare responsibilities at B2, B3, SCS and Other grades.</li> <li>• The largest group of men with childcare responsibilities was at B3 band (190)</li> <li>• The largest group of women with childcare responsibilities was at C1 (220)</li> </ul> <p>The SG will undertake research to understand the experiences of women returning to work after maternity leave, however this is not relevant to onboarding which only applies to new employees.</p>	<p>Source: SG 2017 People Survey Gender</p> <p>Source: SG Equality and Mainstream Report 2019</p>	<p>Pregnant women joining the organisation may have a need for workplace adjustments, because of a disability or health condition. We will explore with H&amp;S colleagues how to identify these.</p>																		

			<p>Pregnant women with disabilities will be identified through the project and we will consider how to meet any adjustments relating to pregnancy.</p> <p>We will seek views on the experiences of pregnant new employees with health conditions through networks, trade unions and other forms of engagement continue to improve the evidence base for this project and</p>
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			seek continuous feedback from users.
<b>GENDER REASSIGNMENT</b>	<p>Statistics for trans people in Scottish Government are suppressed due to very low returns. This has identified a gap.</p> <p>The Scottish Transgender Alliance<sup>[66]</sup> observes that the workplace is one of the most likely locations for transphobic discrimination and harassment to occur, and as a result many Transgender people are unemployed, under-employed or self-employed - Morton (2008)<sup>[67]</sup> found that 19.7% of the respondents to his survey in Scotland were self-employed, although no comparison should be made from this sample to a national average.</p>	<p>Source: SCOTTISH GOVERNMENT EQUALITY OUTCOMES: LESBIAN, GAY, BISEXUAL AND TRANSGENDER (LGBT) EVIDENCE REVIEW Scottish Government Social Research 2013</p> <p>Source: SG LGBT Evidence Review 30 April 2013</p>	<p>Specific work during induction to encourage new employees to complete diversity information as part of induction will be enabled (separate workstream)</p> <p>. Work by D&amp;I team is planned to increase confidence in completing diversity information.</p> <p>We will continue to</p>

	<p>The SG will develop training and further guidance to accompany our refreshed Trans Equality and Inclusion Policy, to contribute to building a supportive environment for trans colleagues. We will develop further guidance for trans employees and their colleagues to support the refreshed policy.</p> <p>It is important to note the severe limitations on Transgender data. The EHRC Transgender Research Review presents a wealth of methodological material concerning definitions, research and data on Transgender people. It observes that, although there is a considerable amount of literature produced for campaigning or lobbying purposes, commentary on the legal position of Transgender people and anecdotal discussion of experiences, there is only a small number of robust studies. Where primary research has been conducted, difficulties associated with identifying Transgender people mean that samples were often too small to make robust generalisations from the data, or that reliance on convenience sampling meant that it was not possible to be sure that the studies had mapped sufficient diversity within the Transgender community to draw substantive conclusions. The Review specifically points out the methodological difficulties of conducting international comparative research, due to broad variations in administration, finance and ethics in different countries, in addition to the small amounts of Transgender research being undertaken in any country.</p> <p><a href="#">Health disparities at the intersection of disability and gender identity literature review</a></p>	<p>Source: Equality and Mainstream Report 2019</p> <p>Source: Life in Scotland for LGBT Young People Analysis of the 2017 survey for lesbian, gay, bisexual and transgender young people</p>	<p>improve the evidence base for this project and seek continuous feedback from users.</p>
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<p><b>SEXUAL ORIENTATION</b></p>	<p>LGB and other were twice as likely to be unemployed compared to those who identified as 'heterosexual'</p> <ul style="list-style-type: none"> <li>In 2018, people who identified as 'LGB and other' were twice as likely to be unemployed compared to those who identified as 'heterosexual' (4.0 percent versus 2.0 per cent). It is important to note that a higher proportion of those identifying as 'LGB and other' were in the age groups 16-24 and 25-34, which were also the age groups where unemployment was higher.</li> </ul> <p>Declaration rates have increased since we began gathering data in 2015</p> <p>In 2018 the Scottish Government workforce was made up of:</p> <ul style="list-style-type: none"> <li>3.6% identified as Lesbian, Gay, Bisexual or an Other minority sexual orientation</li> <li>62.3% identified as Heterosexual or straight</li> <li>The sexual orientation is not known for 34.1% of staff.</li> </ul> <p>Between 2015 and 2018:</p> <ul style="list-style-type: none"> <li>LGBO people increasingly comprise more of the organisations workforce: increasing from 1.9% to 3.6%</li> <li>Declaration rates have increased from 49.8% to 69.7%</li> </ul> <p><b>SG Distribution of sexual orientation - trend</b></p>	<p>Source: <a href="#">Scottish Surveys Core Questions 2018</a> (Last updated: October 2019)</p> <p>Source: E&amp;HRC Source: Is Scotland Fairer Report 2018</p> <p>Source: <a href="#">Equality Outcomes and Mainstreaming Report 2019</a> (Last updated: April 2019)</p>	<p>We will seek views on the experiences of LGBO new employees with health conditions through networks, trade unions and other forms of engagement as well as drawing on performance data throughout the project and information provided by central analytical services team (CAST).</p> <p>We will continue to improve the evidence base for this</p>
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		LGBO	Heterosexual/ straight	Prefer not to say	Unknown		project and seek continuous feedback from users.
	June 2018	3%	63%	4%	29%		
	June 2019	4%	66%	4%	25%		
	September 2019	4%	67%	4%	24%		
	December 2019	4%	67%	4%	24%		
	March 2020	5%	66%	4%	25%		
	June 2020	5%	66%	4%	25%		
<b>RACE</b>	<p>Minority Ethnic staff increasingly comprise more of the Scottish Government's workforce</p> <p>In 2018 the Scottish Government workforce was made up of:</p> <ul style="list-style-type: none"> <li>• 2.1% were minority ethnic</li> <li>• 80.0% were white</li> <li>• The ethnic group is not known for 18.0% of staff.</li> </ul> <p>Between 2013 and 2018:</p> <ul style="list-style-type: none"> <li>• Minority ethnic people increasingly comprise more of the organisations workforce: increasing from 1.6% to 2.1%</li> <li>• Declaration rates have increased from 78.7% to 83.8%</li> </ul> <p>Disabled people who are in a minority ethnic group have an employment rate of 37.9%, lower than non-disabled minority ethnic people (57.8%).</p>					<p>Source: <a href="#">Equality Outcomes and Mainstreaming Report 2019</a> (Last updated: April 2019)</p> <p>Source: <a href="#">Disabled people in the labour market in Scotland 2018</a> (Published: February 2020)</p>	<p>We will seek views on the experiences of new minority ethnic employees with health conditions through networks, trade unions and other forms of engagement as well as drawing on performance data throughout the project and</p>



The SG intends to take every opportunity to improve and increase the diversity of our workforce, including increasing the proportion of Black and Minority Ethnic employees from the current 2.4% to one that better represents the people of Scotland.

Scottish Government is committed to implementing a Race Recruitment and Retention Plan which will have at its heart an explicitly anti-racist approach. The plan will also set out action to improve the representation of ethnic minority staff at all grades and levels of the organisation. We will work together with colleagues developing this plan to ensure that both work-streams are aligned and any common issues identified.

**Table: Distribution of ethnic group – trend**

	Ethnic minority	White	Prefer not to say	Unknown
June 2018	2%	83%	2%	13%
June 2019	2%	83%	2%	13%
September 2019	2%	83%	2%	13%
December 2019	2%	82%	2%	13%
March 2020	2%	81%	2%	14%
June 2020	2%	81%	2%	15%

Source: [Equality Outcomes and Mainstreaming Report 2019](#) (Last updated: April 2019)

information provided by central analytical services team (CAST).

We will continue to improve the evidence base for this project and seek continuous feedback from users.

**RELIGION OR BELIEF**

We are not aware of any relevant existing evidence at this time on religion or belief in relation to the policy.

People belonging to a faith group with a disability may also need prayer or contemplation spaces.

**Table: Distribution of religion or belief - trend**

	Christian	Other Religion	No Religion	Prefer not to say	Unknown
June 2018	27%	2%	38%	4%	30%
June 2019	27%	2%	41%	5%	26%
September 2019	27%	2%	42%	5%	25%
December 2019	27%	2%	42%	5%	24%
March 2020	26%	2%	42%	5%	25%
June 2020	26%	2%	42%	4%	25%

Source: Equality Outcomes and Mainstreaming Report 2019 (Last updated: April 2019)

We will seek views on the experiences of new employees with health conditions of different faith groups through networks, trade unions and other forms of engagement as well as drawing on performance data throughout the project and information provided by central analytical services team (CAST).

We will continue to improve the evidence

			base for this project and seek continuous feedback from users.
<b>MARRIAGE AND CIVIL PARTNERSHIP</b>	This work does relate to HR policy and practice, although we are not aware of any relevant existing evidence at this time on marriage or civil partnership in relation to the policy.	N/A	We will seek views on the experiences of new employees with health conditions of different genders groups through networks, trade unions and other forms of engagement as well as drawing on performance data throughout the project and information provided by central

			<p>analytical services team (CAST).</p> <p>We will continue to improve the evidence base for this project and seek continuous feedback from users.</p>
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### Stage 3: Assessing the impacts and identifying opportunities to promote equality

1.1 Having considered the data and evidence you have gathered, this section requires you to consider the potential impacts – negative and positive – that your policy might have on each of the protected characteristics. It is important to remember the duty is also a positive one – that we must explore whether the policy offers the opportunity to promote equality and/or foster good relations.

#### Do you think that the policy impacts on people because of their age? Yes

Age	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation	x			<p>The new process will promote early discussion with all new employees; links between age and disability made where relevant, and enable early conversations which will allow identification of individual needs.</p> <p>The service will improve the identification and provision of workplace adjustments, including those related to age.</p>
Advancing equality of opportunity	x			<p>While the process will improve access to workplace adjustments for new employees in different age groups with a disability or health condition, they will be identified to the team on the basis of their health. We will seek to improve evidence on different age groups and gain feedback to make improvements to the process throughout.</p> <p>People in different age groups with a disability should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments.</p> <p>Adjustments seek to remove barriers to allow people to perform at their best at work.</p>

Promoting good relations among and between different age groups			x	Evidence tells us that the delays and communication problems that can arise during onboarding can affect the relationship between the new employee and their line manager and HR negatively
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**Do you think that the policy impacts disabled people? Yes**

Disability	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation	x			<p>The process has been developed to improve the onboarding process for people with a disability or health condition. Early and enhanced discussion about disabilities and health conditions will be enabled quickly. The policy allows for workplace adjustments on a case by case basis to allow successful candidates to undertake the role to the best of their ability. High unemployment but a willingness to work is highlighted in the evidence gathered. People are more likely to be unemployed if they are disabled. The onboarding process will enable new employees to start their role with the correct adjustments in place, and by enabling that ensure that they are not discriminated against by delaying their start date.</p> <p>If equipment takes longer than the 6 week lead in time (the period between job offer and start date) to put into place this could delay the start date and mean that new employees with a disability are missing out on being paid when those without a disability have already started. Onboarding with a transparent, efficient and effective process will mean that people with disabilities and health conditions start on the same date as other staff, rather than face delays while adjustments are put in place.</p>

				<p>Because people with disabilities are more likely to be unemployed, we cannot assume that they will be moving into the organisation from existing employment. There is a risk that if we delay the start date and 'paid from' date there may be indirect discrimination. Ensuring that someone needing an adjustment is on the payroll at the same time as other new employees will be an aim of this project.</p> <p>Successful candidates are asked for information about their disability twice during recruitment: once for interview and again once they have been successful. We will explore whether we can reduce the impact of this as we know that repeating their story can be a negative experience.</p> <p>The new process will promote early discussion with all new employees; links between other protected characteristics and disability or health condition, and enable early conversations which will allow identification of individual needs. It will apply to all conditions, neurological, physical, cognitive and mental. There may be issues relating to interdependencies.</p>
Advancing equality of opportunity	x			<p>Workplace adjustments are enabled for physical, neurological, cognitive and mental conditions where possible and in line with OH/specialist advice and through positive engagement with candidates. However, it is clear that improvements are required in areas of the process to identify and enable workplace adjustments quickly, efficiently and effectively, to eliminate the need for candidates to retell their story and reduce stress and uncertainty. Training and development is a priority and will be identified for relevant staff and line managers.</p>

				New employees with a disability should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments.
Promoting good relations among and between disabled and non-disabled people	x			Promoting good relations is achievable by providing a better service, improving awareness by line managers and communication with new employees.

**Do you think that the policy impacts on men and women in different ways? Yes**

<b>Sex</b>	<b>Positive</b>	<b>Negative</b>	<b>None</b>	<b>Reasons for your decision</b>
Eliminating unlawful discrimination	x			The process allows for workplace adjustments on a case by case basis to allow employees to undertake the role to the best of their ability during the on-boarding process and beyond. This may be dependent on role and legislation, (e.g. pregnant women at sea) performance in post and undertaking the role to the best of their ability.
Advancing equality of opportunity	x			<p>The process will improve access to workplace adjustments for new employees of all genders with a disability or health condition. We will seek to improve evidence on different age groups and gain feedback to make improvements to the process throughout.</p> <p>People of all genders with a disability should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments.</p>



Promoting good relations between men and women			x	Evidence tells us that the delays and communication problems that can arise during onboarding can affect the relationship between the new employee and their line manager and HR negatively, although we won't collect information on the gender of recruits and managers.
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**Do you think that the policy impacts on women because of pregnancy and maternity? Yes**

<b>Pregnancy and Maternity</b>	<b>Positive</b>	<b>Negative</b>	<b>None</b>	<b>Reasons for your decision</b>
Eliminating unlawful discrimination	x			The process allows for workplace adjustments on a case by case basis to allow employees to undertake the role to the best of their ability during the on-boarding process and beyond. This may be dependent on role and legislation, (e.g. pregnant women at sea) performance in post and undertaking the role to the best of their ability. Adjustments include pregnancy and maternity related conditions. However we will not know if a new employee is pregnant before starting in post unless they disclose this information as relevant to their disability or adjustment.
Advancing equality of opportunity	x			New employees who are pregnant with a disability, or need a pregnancy related workplace adjustment will benefit by accessing their adjustments quickly.  New employees who are pregnant should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments.
Promoting good relations	x			New employees who are pregnant with a disability/and require an adjustment will have better communication with

				HR and manager and experience of the organisation from the point of entry.
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**Do you think your policy impacts on people proposing to undergo, undergoing, or who have undergone a process for the purpose of reassigning their sex? (NB: the Equality Act 2010 uses the term ‘transsexual people’ but ‘trans people’ is more commonly used) Yes**

<b>Gender reassignment</b>	<b>Positive</b>	<b>Negative</b>	<b>None</b>	<b>Reasons for your decision</b>
Eliminating unlawful discrimination	x			<p>Trans people will receive workplace adjustments on a case by case basis to allow employees to undertake the role to the best of their ability during the on-boarding process and beyond.</p> <p>The service will improve the identification and provision of workplace adjustments.</p>
Advancing equality of opportunity	x			<p>The process will improve access to workplace adjustments for new trans employees.</p> <p>Trans people should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments.</p>
Promoting good relations	x			<p>We won't identify trans people unless they disclose the information to us. We would not record this information unless requested to. Any information disclosed would be with the consent of the employee, however the service is designed to increase awareness and understanding of line managers and offer better and informed support to employees and so offers the chance of improved communication and relations.</p>

**Do you think that the policy impacts on people because of their sexual orientation? Yes**

Sexual orientation	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	x			<p>LGBO people with a disability will receive workplace adjustments on a case by case basis to allow employees to undertake the role to the best of their ability during the on-boarding process and beyond. However we will not know if the new employee is LGBO unless they disclose the information as relevant to their adjustment.</p> <p>The service will improve the identification and provision of workplace adjustments.</p>
Advancing equality of opportunity	x			<p>The process will improve access to workplace adjustments for new LGBO employees groups with a disability or health condition.</p> <p>LGBO people with a disability should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments.</p>
Promoting good relations	x			<p>We won't be able to identify LGBO people with a disability unless they disclose the information to us. We would not record this information unless requested to. We would only disclose information to their manager with their consent and if relevant to their adjustment or barriers likely to be faced at work. The service is designed to increase awareness and understanding of line managers and offer better and informed support to employees and so offers the chance of improved communication and relations.</p>

**Do you think the policy impacts on people on the grounds of their race? Yes**

Race	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination	x			<p>New minority ethnic employees with a disability will receive workplace adjustments on a case by case basis to allow employees to undertake the role to the best of their ability during the on-boarding process and beyond. We will not know if the new employee is minority ethnic unless they disclose the information as relevant to their adjustment.</p> <p>The service will improve the identification and provision of workplace adjustments.</p>
Advancing equality of opportunity	x			<p>The process will improve access to workplace adjustments for new minority ethnic employees with a disability or health condition. We will seek to improve evidence on different ethnicity groups and gain feedback to make improvements to the process throughout.</p> <p>New minority ethnic employees with a disability or health condition should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments.</p> <p>This has been clearly shown in our commitment to increasing the percentage of ethnic minority candidates in the workplace, which the Race Retention and Recruitment plan will further set out.</p>
Promoting good race relations	x			<p>We won't be able to identify minority ethnic people with a disability unless they disclose the information to us.</p>

				The service is designed to increase awareness and understanding of line managers and offer better and informed support to employees and so offers the chance of improved communication and relations.
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**Do you think the policy impacts on people because of their religion or belief? Yes**

<b>Religion or belief</b>	<b>Positive</b>	<b>Negative</b>	<b>None</b>	<b>Reasons for your decision</b>
Eliminating unlawful discrimination	x			New employees will receive workplace adjustments on a case by case basis to allow employees to undertake the role to the best of their ability during the on-boarding process and beyond. We will not know if the new employee belongs to a faith group unless they disclose the information as relevant to their adjustment.
Advancing equality of opportunity	x			The process will improve access to workplace adjustments for new employees in all faith groups with a disability or health condition. We will seek to improve evidence on different faith groups and gain feedback to make improvements to the process throughout. People of all faith groups with a disability should not experience delays to starting their new role because of the time taken to access adjustments or experience periods or begin their role without adjustments. If disclosed, we will provide positive engagement with candidates to let them know of contemplation and meditation or prayer rooms and the single point of contact with the team will allow for positive communication and allow for identification of any barriers that may be addressed.
Promoting good relations	x			We won't be able to identify new employees' faith group unless they disclose the information to us. We would not record this information unless requested to. We would only

				disclose this information to their manager if relevant to their adjustment and with their permission. The service is designed to increase awareness and understanding of line managers and offer better and informed support to employees and so offers the chance of improved communication and relations.
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**Do you think the policy impacts on people because of their marriage or civil partnership? Yes**

<b>Marriage and Civil Partnership<sup>6</sup></b>	<b>Positive</b>	<b>Negative</b>	<b>None</b>	<b>Reasons for your decision</b>
Eliminating unlawful discrimination			x	The policy/process has been developed to address/improve the onboarding process. The policy will continue to support the onboarding and career development of individuals in this group.

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<sup>6</sup> In respect of this protected characteristic, a body subject to the Public Sector Equality Duty (which includes Scottish Government) only needs to comply with the first need of the duty (to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010) and only in relation to work. This is because the parts of the Act covering services and public functions, premises, education etc. do not apply to that protected characteristic. Equality impact assessment within the Scottish Government does not require assessment against the protected characteristic of Marriage and Civil Partnership unless the policy or practice relates to work, for example HR policies and practices.

## Stage 4: Decision making and monitoring

### Identifying and establishing any required mitigating action

<p>Have positive or negative impacts been identified for any of the equality groups?</p>	<p>Employee diversity information and workplace adjustment requests do not currently marry up. We intend to build equality monitoring into our processes by changing the design of our feedback forms so that we can get build a better picture of the people using the WAS service.</p> <p>Parallel work will be undertaken by the D+I team to increase confidence in staff to disclose their equality information.</p> <p>Processes and guidance will be clear that information shared with line managers is only with direct consent of the individual.</p> <p>Workplace adjustment discussions with candidates will only happen after an offer of employment is made. This is to alleviate concerns about disclosure impacting negatively on job chances.</p> <p>In order to provide a service where feedback is genuinely continuous we will set up staff groups where WAS is freely discussed on an ongoing basis.</p> <p>The service centres on adjustments being in place in time for the first day at work. Where this means a potential delay in the start date, this will be negotiated with the individual. We recognise that there are many factors to consider when deciding on start date – including financial, or feelings of discrimination which counterbalance the need for the workplace adjustment to be in place on day one. This will be decided on a case-by-case basis and crucially in partnership with the individual.</p> <p>The focus of the current work is new employees with disabilities or health conditions. We recognise that there are intersections between disability and other protected characteristics</p>
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	<p>which we will explore further in our engagement with staff and service users/providers. Here we set out mitigating actions in response to the processes set out in the Storm ID report.</p> <p>Line manager engagement will be an important element of this work as the evidence told us that they don't always understand the adjustment needs of employees. It will help to put in place trust, confidence and the foundation for a positive relationship.</p> <p>We will contribute to the new line manager handbook and the new guidance on induction to make sure managers know what is available and appropriate.</p> <p>The purchasing of specialist equipment will be recorded and a record of where that equipment is enabled or stored will be held centrally. This will make equipment easier and faster to access.</p> <p>Provide opportunities to work from the most suitable workplace whether that be home or an SG building note this project is being undertaken during the COVID-19 pandemic and during this time all new employees will work from home. Processes are in place across SG to ensure adjustments are provided in the home, for example alternative raised desks (standard 'standing' desks are too large for homes).</p>
Is the policy directly or indirectly discriminatory under the Equality Act 2010 <sup>7</sup> ?	There is no evidence that the policy is directly or indirectly discriminatory under the Equality Act 2010.
If the policy is indirectly discriminatory, how is it justified under the relevant legislation?	N/A
If not justified, what mitigating action will be undertaken?	N/A

Describing how Equality Impact analysis has shaped the policy making process  
In this section, set out a narrative that describes how the equality impact analysis has shaped and informed your policy development.

<sup>7</sup> See EQIA – Setting the Scene for further information on the legislation.



This impact assessment has helped to identify existing evidence and gaps, thus helping to shape engagement and design of the project. We are engaging with representatives of the people potentially affected, as well as representatives of people with the other protected characteristics, to ensure that there are no unintended consequences. This information will influence further iterations of this EQIA.

The Storm ID report built on other evidence to give detailed information about the organisation's onboarding process and how it was experienced by users and members of staff involved in the adjustments process. It set out the negative impacts experienced by some staff and the difficulties experienced as a result of a lack of clear process, roles and responsibilities between different teams in SG. We will add to the information gathered through engagement with staff by engaging with the affected teams and the new employees whom we support. This will impact on the way we deliver the project by ensuring continuous improvement.

The evidence has shaped the process in the following ways:

- A proposed user model for a new service to provide early intervention and one to one communication to identify the employees' needs early on
- A review of how often a candidate/employee has to disclose their adjustment requirements – actions to reduce the number of time a person has to 'retell' their story, while balancing data protection requirements.
- Proposed amendments to the next contract with Optima Health
- The need to better understand cross sectional circumstances of staff
- The need to link up new processes with wider review of Line Manager and Induction Guidance.
- Early and better line manager engagement to put in place the foundation for a positive relationship and better understanding of the employee's needs
- Negotiating the start date with the individual rather than just business need
- Monitoring and review of the experience for new employees, staff in HR/corporate services and line managers

## **Monitoring and Review**

This process will be monitored and reviewed using experience from the pilot SG recruitment exercises. The WAS project team will engage with HR and corporate services colleagues, line managers and successful candidates to gather and assess feedback from candidates and managers. The feedback will be assessed and further adjustments/enhancements enabled dependent on the outcome of the assessment. Reviews will be carried out regularly in line with SG recruitment campaigns.

We will engage with key stakeholders throughout the workplace adjustments project for input to the process, and seek feedback from users from anonymous surveys.

## Stage 5 - Authorisation of EQIA

Please confirm that:

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

Yes  No

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

- Eliminating unlawful discrimination, harassment, victimisation;
- Removing or minimising any barriers and/or disadvantages;
- Taking steps which assist with promoting equality and meeting people's different needs;
- Encouraging participation (e.g. in public life)
- Fostering good relations, tackling prejudice and promoting understanding.

Yes  No

- ◆ If the Marriage and Civil Partnership protected characteristic applies to this policy, the Equality Impact Assessment has also assessed against the duty to eliminate unlawful discrimination, harassment and victimisation in respect of this protected characteristic:

Yes  No  Not applicable

### Declaration

I am satisfied with the equality impact assessment that has been undertaken for **the Workplace Adjustments on-boarding project** and give my authorisation for the results of this assessment to be published on the Scottish Government's website.

Name: Judith Mackinnon

Position: Deputy Director

Authorisation date: 15/3/2021



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