



Scottish Natural Heritage
Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Equality Impact Assessment: initial screening

What is being assessed by whom?

Name of the policy¹
SNH Workforce Plan 2018-22
Name of person leading the assessment²
Emma Jordan
Names of other team members
Ross Johnston, Alison MacDonald
Is this a new or existing policy? New <input type="checkbox"/> Existing being reviewed <input checked="" type="checkbox"/> If existing, then please check to see whether a previous EqlA is available to provide a basis for this assessment.

Initial screening

	Yes	No
Does the policy impact on people? (e.g. on service users, businesses, employees, wider community)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Will it have a significant effect on how other organisations operate?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does it relate to an area where SNH has set equality outcomes³ ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does it relate to an area where there are known inequalities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹ The term policy is shorthand for policies, provisions, criteria, functions, practices and activities including the delivery of services.

² Person leading on the policy development

³ Through the delivery of our services people who are under-represented as a result of a protected characteristic are more able to visit and experience the outdoors

Our workforce broadly reflects the diversity of the population of Scotland

Our workforce welcomes, values and promotes diversity

The gender pay gap is reduced

If you answered **Yes** to any of the above, please proceed to Stage 1 of the EqIA form.

If you answered **No** to all of these, you do not need to carry out an EqIA so proceed to sign and complete the statement below.

An EqIA is not needed Date:

Signed	Date
Lead officer:	
Responsible officer ⁴ :	

⁴ Person with overall responsibility for the policy.

Equality Impact Assessment: assessing impact

The purpose of the policy, service, activity etc.

What is the purpose of the policy?	The revised policy will set out how we will develop and deploy our staff to deliver the outcomes in the Corporate Plan for 2018-22 and beyond. We will continue to develop the talent we have to meet changing priorities, through talent and performance management, while bringing new skills into the organisation, and meeting the career aspirations of an aging workforce. We will develop inclusive leadership and continue our flexible deployment approach to meet demands. We will work to ensure equality outcomes are met.
Who does the policy affect? (employees, customers, equality groups, stakeholders)	Delivery partners/ stakeholders and SNH staff
What results/outcomes are intended?	SNH's Workforce Plan is intended to ensure that we have the right people, with the right skills, in the right place at the right time.

Relevance to the needs of the general equality duty

	Comment
Eliminate unlawful discrimination	The Plan reflects the corporate commitments to equality and fair pay.
Advance equality of opportunity	The Plan will ensure openness and fairness in developing staff and individuals, within the context of wider corporate need, including specific commitments around youth, gender and BME representation. The plan will aim to increase representation of those protected characteristics that are currently underrepresented within SNH and within specific SNH

	functions by aligning to the Equality Outcomes as outlined in our Mainstreaming Report 2017
Foster good relations between groups of people	Focus on improving intergenerational relations with SNH and collaboration with external equality groups

To which of the equality groups is this policy relevant?

All	<input checked="" type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Age	<input type="checkbox"/>	Gender reassignment	<input type="checkbox"/>
Disability	<input type="checkbox"/>	Pregnancy and maternity	<input type="checkbox"/>
Gender	<input type="checkbox"/>	Religion and belief	<input type="checkbox"/>
Race	<input type="checkbox"/>		

If you decide that the assessment is not relevant to some groups, please say why below.

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Evidence

Protected characteristic	Evidence	Source	Evidence gaps and actions taken to address them
Age	<p>The estimated population for Scotland on 30 June 2015 was 5,373,000, with 17% of people estimated to be aged under 16, 65% aged 16-64 and 18% aged 65 and over.</p> <p>Within SNH, of the 753 employees in 2016/2017, there has been a downward trend since 2013/14 in the 25-34 age group and continuing upward trend in employees aged 45-54 and 55-64. We employ low numbers of 16-24 year olds, and 59% of SNH employees are aged over 45.</p> <p>The youth (16-24) employment rate in Scotland decreased by 0.7 percentage points over the year from 56.4% in 2015 to 55.7% in 2016.</p> <p>There is anecdotal evidence in SNH that in smaller offices younger staff leave because of intergenerational differences in styles of working.</p>	<p>National Records of Scotland, 2015</p> <p>SNH Mainstreaming Report 2017</p> <p>Annual Population Survey, Jan-Dec 2016, ONS.</p>	<p>The aging profile of SNH's workforce shows the importance of initiatives around youth employment and succession planning.</p> <p>Talent management programme and performance management processes need to address the changing career aspirations of the older workforce.</p> <p>Development of initiatives to harness the benefits of an intergenerational organisation.</p>
Disability	<p>The proportion of people in Scotland with a long-term activity-limiting health problem or disability was 20% in 2011, the same as the 2001 census. However 32% of adults in</p>	<p>Scotland's 2011 Census (Release 2A, Table 8)</p> <p>Scottish Health Survey, 2012</p>	<p>The reasons for non-disclosure are unclear and SNH will review this and report our findings in future reports. We</p>

	<p>Scotland report a limiting long-term condition or disability.</p> <p>2.39% of employees identify as having a disability, however this is based on only 55% of the workforce declaring their status on the HR system, However SNH data suggests that there is significantly more staff with hidden disabilities (mental and behavioural).</p> <p>Research consistently finds that disabled people are less likely to be in employment than non-disabled people and when employed they receive, on average, lower pay. There are also differences in the personal characteristics of disabled people and non-disabled people that have an impact on the pay gap. For example, lower levels of education or reduced ability to work continuously on a full-time basis can have a negative impact on pay.</p> <p>Recent Government review of mental health and employability aims to increase people with mental health issues in employment.</p>	<p>SNH Mainstreaming Report 2017</p> <p>Occupational Health metrics Wellbeing Survey 2017</p> <p>EHRC pay-gap research – The disability pay gap 2017</p> <p>Thriving at work, The Stevenson/Farmer review of Mental Health and Employers</p>	<p>continue to actively encourage employees to disclose their data.</p> <p>We will work closely with NHS Scotland/Validium/development of Mental health Champions/Equality groups to develop a supportive culture. We will develop an Inclusive Leadership programme.</p> <p>Wellbeing and inclusive leadership will be integrated into our values and performance management processes.</p>
Gender	<p>Companies with a higher proportion of women in top management financially outperform organisations with less diverse organisations.</p> <p>The gender profile of our employees continues to show a slightly higher proportion of females to males, 57.1% to</p>	<p>Women Matter, McKinsey & Company (2007)</p> <p>SNH Mainstreaming Report 2017</p>	<p>Take positive action to address the gender imbalance within relevant units and grades.</p> <p>Opportunities should have no locational restrictions (only by exception). Investment in mobile technology and</p>

	<p>42.9%, though males are still in the majority in more senior roles. In Scotland, there are roughly equal numbers of males and females.</p> <p>We have met our 2020 target for 50:50 representations on the SNH Board; currently 60% of our Board is female.</p> <p>The overall mean gender pay gap between men and women in SNH (including part time workers) is 15.01%. This is an increase from 2015 when it was 13.7%. However part of this is explained by a change in the calculation method. Using the earlier method, the gap is 13.6%, a reduction of 0.1% on 2015.</p> <p>In 2013 SNH's Protected Places Unit was identified as an area where there was low representation of women. This unit merged into our National Operations Unit with a number of other specialist staff. The restructure has exacerbated the gender imbalance with only 31% of female staff in the restructured unit in 2017. The Ecosystems and biodiversity unit has also experienced a decrease since 2014, with 40% female staff.</p> <p>Administrative grades (A&B) within SNH are occupied predominantly by women (72%), an increase of 5.8% since 2013. The increase is predominantly as a result of our Youth employment strategy. This is similar</p>		<p>development of Agile Working Guidance will provide greater flexibility for staff of all grades to work more flexibly.</p> <p>Work in partnership with Close the Gap/Equate to ensure that SNH take positive action where possible and develop youth strategy accordingly;</p> <p>We will develop a Women's Equality Network whose outputs will feed into the workforce plan steering group for necessary actions.</p>
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	to other organisations where traditionally such roles tend to be carried out by women who combine work and caring responsibilities (child care and elder care). Paybill restrictions have resulted in fewer promotional opportunities for all staff however for staff at these grades there is a further locational barrier to administrative opportunities when they arise.		
Gender reassignment	<p>Currently, there is no fully tested recommended question with which to collect information on gender identity in surveys or other data sources. However the government are currently consulting on a review of gender recognition legislation. It is likely to include the inclusion of a non-binary category in equal opportunity monitoring. We will update our relevant processes as required on publication of the new legislation.</p> <p>There was no disclosure of transgender status from our employees.</p>	SNH Mainstreaming Report 2017	
Marriage and civil partnership	In 2016/2017, 53% employees identified themselves as married, 0.27% in a civil partnership, 29% as single, 10% as living together, 5% as divorced, 1.33% as widowed, 1.20% as separated and 0.13% preferred not to say. The remaining 0.40% declined to answer.	SNH Mainstreaming Report 2017	
Pregnancy and	No employee has been refused maternity leave. Women more likely to return after	SNH Mainstreaming Report 2017	Development of Inclusive Leadership programme. Senior

maternity	maternity leave to part time work therefore lower paid work. More likely to see part time working as a barrier to promotion.		<p>leaders should not 'unconsciously' promote an excessive working hours culture.</p> <p>The impact on productivity of reduced working hours will be assessed during the 35 hour working week pilot.</p> <p>We will develop a Women's Equality Network whose outputs will feed into the workforce plan steering group for necessary actions</p>
Race	<p>The size of the minority ethnic population in 2011 was just over 4% the total population of Scotland (based on 2011 ethnicity classification). The minority ethnic population varies considerably across Scotland. Some groups are disproportionately represented in the lowest 15% SIMD areas – Polish, African and Caribbean.</p> <p>There is growing evidence that companies in the top quartile for diversity financially outperform those at the bottom quartile. Ethnically diverse organisations are 35% more likely to outperform organisations than those from less diverse organisations.</p> <p>According to analysis of Labour Force Survey (LFS) data in the period 2002-2014,</p>	<p>Scotland's Census 2011</p> <p>Diversity Matters, McKinsey Report</p> <p>EHRC pay-gap research – The ethnicity pay gap 2017</p>	<p>The reasons for non-disclosure are unclear and SNH will review this and report our findings in future reports. We continue to actively encourage employees to disclose their data.</p> <p>We will work closely with Equality groups to take positive action to increase engagement with BAME groups around opportunities.</p> <p>Through our youth panels and development of other networks we will work closely to further understand and address the barriers to working for SNH for</p>

	<p>the mean hourly pay of different ethnic groups varied considerably. Gaps also varied depending on whether people in ethnic minorities were born in the UK or abroad. New arrivals often face social disadvantage and discrimination, may have a poor command of English, possess qualifications which are not generally recognised by employers and be unfamiliar with the UK's culture; these factors affect pay.</p> <p>Among men the White British group tended to be paid more than ethnic minorities. There are a few exceptions - all Indian and Chinese men (foreign-born and British) and British-born Black African men. For other groups, Pakistani and Bangladeshi males had particularly severe pay gaps, especially those born outside the UK.</p> <p>Ethnic minority women generally earned more than White British women, only two groups had a clear pay disadvantage: these were Pakistani and Bangladeshi immigrant women.</p> <p>Of the data we hold, less than 1% of our employees identify as being from an ethnic minority group. However a large percentage of employees, 48% for 2016/2017 and 2015/2016, still have not disclosed their ethnicity within the HR system.</p>	<p>SNH Mainstreaming Report 2017</p>	<p>the BAME population.</p> <p>We will also need to have regard to links between race and socio-economic status.</p>
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Religion or belief	<p>In 2014, 52% of people in Scotland stated their religion was Christian. In comparison, 45% of people stated that they had no religion. The remaining 3% of people include Muslim, Hindu, Buddhist, Pagan, Jewish, Sikh and 'Another religion' responses.</p> <p>2016/2017 results show that 17% of our employees identify with a Christian religion, whilst 28% stated they have no religion or belief, 8% preferred not to say and 46% chose not to disclose. The remaining 1% of employees identify with other religions or belief groups</p>	SNH Mainstreaming Report 2017	
Sexual orientation	<p>In 2014, the overall proportion of those identifying as LGB and Other was 1.6%, which is the same as it was in 2012.</p> <p>For 2016/2017, 45% employees identify themselves as heterosexual, with 1% identifying as bisexual, gay, lesbian or other. However employees remain unwilling to disclose, 45%, and 9% preferring not to say.</p>	SNH Mainstreaming Report 2017	

The significance of the potential impacts

Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the policy offers opportunities to promote equality and/or foster good relations.

Protected characteristic	Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
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Age	<p>Through our Workforce Planning projects we will review how we harness the skills and life experience older employees bring and ensure that equalities are built into our Talent Management Programmes.</p> <p>Projects are also in progress to develop synergies between our age profile and skills framework, looking to align experience of our workforce and potential skills gaps (succession planning). This will also align with future development of our youth strategy to allow opportunities to develop the skills, training and employment opportunities for young people both within our organisation and across other public sector bodies. We are also working in partnership with others to expand our youth strategy, looking to implement cross organisation schemes (e.g. modern apprenticeships, shared graduate / student placements) to continue to provide further opportunities for young people.</p> <p>In 2016/17 we supported six graduate placements and we will support a further nine in 2017/18, covering a wide range of SNH activity. For 2015/16 and 2016/17, we had six modern apprenticeships commence and five completed.</p> <p>In 15/16, 150 young people volunteered on SNH managed NNRs. We also funded around 84 projects that engaged nearly 100,000 young people in outdoor recreation, learning, volunteering and citizen science activity</p>	+	M
Disability	<p>There are no direct impacts on people with disabilities associated the workforce plan, though our existing recruitment and equality policies ensure there is no discrimination. However, we recognise the current disparity between the SNH's employee composition compared to Scotland's working age population in relation to the proportion of people declaring a disability. We intend to explore the causes for this disparity further and take appropriate action to ensure that our composition broadly reflects the population of Scotland. We also</p>	+	M

	intended to develop an inclusive leadership programme.		
Gender	Through our Workforce Planning Programme we have started to address the lack of promotional opportunities for female/ part time employees. There will be more opportunities to lead areas of work that may have been traditionally characterised as being out of grade through more flexible deployment.	+	M
Gender reassignment	There are no direct impacts on people with gender reassignments characteristics associated the workforce plan, though our existing recruitment and equality policies ensure there is no discrimination.	0	L
Marriage and civil partnership	There are no direct impacts associated with marital status through the workforce plan, though our existing recruitment and equality policies (including a commitment to report annually on employee information and progress in meeting our equality duty) help to ensure there are no negative impacts	0	L
Pregnancy and maternity	Workforce and succession planning should enable flexible redeployment in the case of maternity leave. However, this is more about making us more responsive, existing HR policies already ensure there are supportive maternity policies in place, with SNH terms and conditions relating to maternity leave and pay going beyond the statutory minimum.	+	L
Race	There are no direct impacts on race characteristics associated the workforce plan, though our existing recruitment and equality policies (including a commitment to report annually on employee information and progress in meeting our equality duty) help to ensure there are no negative impacts	+	M
Religion or belief	There are no direct impacts on religion/ belief associated the workforce plan, though our existing recruitment and equality policies (including a commitment to report annually on employee information and progress in meeting our equality duty) help to ensure there are	0	L

	no negative impacts		
Sexual orientation	There are no direct impacts on sexual orientation characteristics associated the workforce plan, though our existing recruitment and equality policies (including a commitment to report annually on employee information and progress in meeting our equality duty) help to ensure there are no negative impacts	0	L

Action needed to fulfil the needs of the general equality duty

Please consider the results of your impact assessment, what mitigating or positive action do you recommend in order to fulfil the three needs of the general equality duty? This will involve considering whether the evidence indicates that there is likely to be a differential impact⁵ on particular equality groups, and particularly whether this impact is disproportionately negative.

Remember that it is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place single-sex provision where there is a need for it. It is both lawful and a requirement of the general equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

Needs of the general equality duty	Mitigating or positive actions needed, recommended or planned for each protected characteristic. (Age, Disability, Gender, Race, Sexual orientation, Gender reassignment, Pregnancy and maternity, Religion or belief)
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⁵ Suggests that a particular group has been affected differently by a policy, in either a positive, neutral or negative way.

<p>1. Eliminate unlawful discrimination, victimisation or harassment</p>	<p>There were no negative impacts identified.</p> <p>Fulfilling our commitment to equality on boards by 2020 and gender pay equality will support moves to eliminate discrimination.</p> <p>Continuing participation with network groups and events, in particular the NDPB Equality Forum and others where appropriate.</p> <p>Staff mentoring falls with the Plan, and provides a safe space for staff to explore any issues they may have.</p> <p>The Workforce Planning programme board and specific project managers work closely with the Unions and HR.</p>
<p>2. Advancing equality of opportunity</p>	<p>There were no negative impacts identified.</p> <p>We have continued to progress our youth apprentices and graduate replacements and are looking at talent management and succession planning.</p> <p>We are also committed to engagement with our staff, ensuring that people feel truly involved in the work that we do, have the opportunity to influence the changes that we make and feel more connected with the outcomes.</p> <p>Our training and development programme, talent management programme, and flexible deployment process should also open up opportunities for all our staff.</p> <p>The plan will aim to increase representation of those protected characteristics that are currently underrepresented within SNH and within specific business functions by aligning to the Equality Outcomes as outlined in our Mainstreaming Report 2017.</p>

3. Fostering good relations	<p>Through our talent management and training and development programme we will work to improve intergenerational relations.</p> <p>We will also engage with underrepresented groups on the development and implementation of the plan by developing more collaborative working with the relevant external equality groups.</p>
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Taking account of the results of the assessment

Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:

- **No major change** – your assessment demonstrates that the policy is robust. There is no potential for unlawful discrimination and you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review
- **Adjust the policy** – this involves taking steps to remove any barriers, to better advance equality or to foster good relations.
- **Continue the policy** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the policy** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the policy altogether. If a policy leads to unlawful discrimination it should be removed or changed.

Option selected	Justification
No major change	The impacts identified are positive or neutral, and will be developed and monitored through more detailed policy development. We have also incorporated Equality and diversity more formally into our workforce planning programme to ensure visibility.

Summary of agreed actions resulting from your assessment

What action, by whom, will be undertaken as a result of the impact assessment.

No.	Action	Person responsible	Timescale
1.	Ensure those progressing policies are aware of this EqIA and informed by its findings. This will be placed on the EqIA intranet and published alongside the plan on the SNH website	Emma Jordan	April 2018

Monitoring implementation

As this is a strategic corporate document, helping to develop and embed workforce planning processes in the organisation, its implementation will be undertaken through business planning and specific projects or pieces of work. Any monitoring would be undertaken at this level.

The impact assessment will be reviewed by March 2022 in line with the review of the workforce plan itself.

Procurement

n/a

Authorisation

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, sex, pregnancy and maternity, gender reassignment, sexual orientation, race and religion or belief have been considered, i.e.:

- Eliminating unlawful discrimination, harassment, victimisation;
- Advancing equality of opportunity;
- Fostering good relations

Yes No

I am satisfied with the equality impact assessment that has been undertaken for the Workforce Plan 2018-22 and give my authorisation for the results of this assessment to be published on the SNH website.

Name:	Ross Johnston
Position:	Head of Operations
Authorisation date:	8 March 2018

Note: if this EqIA is associated with a policy that requires Director, Management Team or Board sign-off, you should arrange for the results of the assessment to accompany approval of the policy. This is to ensure that decision-makers are given sufficient information to enable them to pay due regard to equality when making their decision.

Storing and publishing this EqIA

The regulations require that where an assessment has been made and the policy is implemented, the results of any assessment be published 'within a reasonable period' of the decision to apply the policy.

Please now publish this EqIA in eRDMS file [B239231](#) and send the ID to the Equality and Diversity Team diversity@snh.gov.uk for quality assurance and publishing on the SNH website.