# EQUALITY IMPACT ASSESSMENT FORM

**Not all projects require a full impact assessment. Please review the equality pre-assessment** [**questions**](https://eur03.safelinks.protection.outlook.com/ap/w-59584e83/?url=https%3A%2F%2Fscotent.sharepoint.com%2Fsites%2FIntranet%2FA-z%2FT-equal_opportunities%2FSiteAssets%2FPages%2FEqualopps-eias%2Fquestions.doc&data=05%7C01%7CMargaret.Maynard%40scotent.co.uk%7Ced07756e83444c2308e508da8b4ff4d9%7C50374495fdde4d04bc5c574982680e19%7C0%7C0%7C637975472786817356%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=L8pqVm0659PBpg60Nbjs4aZ9PfGWRYzyBY84au7ItXo%3D&reserved=0) **which define this requirement and inform your** [**equality champion**](https://eur03.safelinks.protection.outlook.com/?url=https%3A%2F%2Fscotent.sharepoint.com%2Fsites%2FIntranet%2FA-z%2FT-equal_opportunities%2FPages%2FWhos-who-equalopps.aspx&data=05%7C01%7CMargaret.Maynard%40scotent.co.uk%7Cb4bc6132cdb2406d243308da8a658e01%7C50374495fdde4d04bc5c574982680e19%7C0%7C0%7C637974466022935882%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=S5bbqB8uVzfpEalb2SFXC28310n6TA2q5FxlVhZSTjg%3D&reserved=0) **of the decision. If you answer YES to any of these** [**questions**](https://eur03.safelinks.protection.outlook.com/ap/w-59584e83/?url=https%3A%2F%2Fscotent.sharepoint.com%2Fsites%2FIntranet%2FA-z%2FT-equal_opportunities%2FSiteAssets%2FPages%2FEqualopps-eias%2Fquestions.doc&data=05%7C01%7CMargaret.Maynard%40scotent.co.uk%7Ced07756e83444c2308e508da8b4ff4d9%7C50374495fdde4d04bc5c574982680e19%7C0%7C0%7C637975472786817356%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=L8pqVm0659PBpg60Nbjs4aZ9PfGWRYzyBY84au7ItXo%3D&reserved=0)**– then this Impact Assessment must be completed.**

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| **Name of Business Unit** | CFO |
| **Name/designation of person(s) responsible for managing/ conducting this process** | Jennifer Paul, Risk Manager |

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| **Name of Policy / Function / Service / Strategy / Action Plan / Programme / Project etc.** | Scottish Enterprise Risk Management Policy |
| **Is it (Delete as applicable)** | ~~New~~ | Existing with changes |
| **Is the policy contracted out? (Delete as applicable)** | No | ~~Yes~~ |
| **If yes, who delivers this policy for the organisation?** | N/A |
| **Is responsibility for delivery shared with others? (Delete as applicable)** | No | ~~Yes~~ |
| **If yes, who are your partners?** | N/A |

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| **Could there be possible impacts or effects in respect of the following protected groups? (Delete as applicable)** |
| **Age**  | **~~Yes/~~No** | **Disability** | **Yes~~/No~~**  |
| **Gender Re-Assignment**  | **~~Yes/~~No** | **Marriage & Civil Partnership** | **~~Yes/~~No** |
| **Pregnancy & Maternity** | **~~Yes/~~No** | **Race**  | **~~Yes/~~No** |
| **Religion or Belief** | **~~Yes/~~No** | **Sex**  | **~~Yes/~~No**  |
| **Sexual Orientation**  | **~~Yes/~~No**  | **Human Rights** | **~~Yes/~~No** |

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| **Timescale for** **Assessment** | April – May 2024 | **Timescale for Involvement/Consultation** | April – May 2024 |
| **Start Date** | 18 March 2024 | **Completion Date** | 1 May 2024 |
| **EO Champion review by** | Margaret Maynard | **Date** | 6 May 2024 |
| **SRO name and email approval on file** | Douglas Colquhoun | **Date** | 7 May 2024 |

## 1. Identify ALL the Aims of the Policy/Project (consider these questions to prompt answers)

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| 1. What is the purpose of the policy/project? (consider explicit and implicit aims)2. Who does the policy/project affect?3. Who does the policy/project benefit directly? (e.g. employees/service users; equality groups, other stakeholders)4. What results/outcomes are intended? |

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| 1. The Risk Management Policy outlines SE’s approach to risk management and sets out the framework to identify, assess, manage and monitor risk in accordance with the Board’s risk appetite. To help with this, risk registers are maintained throughout the organisation and are a key tool to support risk management. This Policy also defines the specific roles and responsibilities that are required to implement the Policy successfully within SE.

 1. The principles and processes set out within the Risk Management Policy apply to all types of SE activity and all types of risk. The Policy applies to all SE colleagues and should be applied consistently across the organisation. All SE colleagues should comply with this Policy, including the specific roles and responsibilities outlined.
2. The Risk Management Policy is an internal procedure that sets out SE’s approach to identifying, assessing and managing risks throughout the organisation. It is supported by a template risk register. Although it is used by staff, it is not anticipated that this Policy would have a direct impact on the people that Scottish Enterprise employs.
3. The Risk Management Policy aims to support effective risk management across the organisation and enable the organisation to prioritise and focus on achieving its priorities and objectives. It is envisaged that the Risk Management Policy will contribute to:
* investing our resources appropriately;
* safeguarding our employees;
* complying with laws and regulations;
* improving our performance and achieving our objectives and intended outcomes;
* protecting or enhancing our reputation amongst key stakeholders;
* safeguarding against financial loss and protecting our assets;
* achieving financial objectives and maintaining effective management of public funds; and
* supporting a strong internal control environment and demonstrating good corporate governance
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## 2. Consider the Evidence (data and information) - (consider these questions to prompt answers)

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| 1. What information or data would it be useful to have? What data (quantitative and qualitative) is available? (in-house/external) How reliable/valid/up-to-date is it?2. What does the data/information tell you about* Different needs?
* Different experiences?
* Different access to services, information or opportunities?
* Different impacts/different outcomes?

3. Are there any gaps that you should fill now/later by further evidence gathering/commissioning or by secondary analysis of existing data?4. Are there any experts or stakeholders you should involve/consult now? Have you involved/consulted any experts already? What were their views? |

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| 1. There is currently no data gathered in SE on the impact of the Risk Management Policy. However, as part of the roll-out of the updated Risk Management Policy, encouragement will be given to colleagues to engage with the Risk Manager to gather information on the general efficacy of the Policy, including the impact of the Policy from an equalities perspective.
2. There is currently no data or information to speak to different needs, experiences, access to services, information or opportunities or impacts/outcomes. However, it is anticipated that as use of the updated Risk Management Policy commences across the organisation, such data/information can be gathered and compiled to answer these questions.
3. As noted above, gaps in data can be filled as use of the updated Risk Management Policy commences across the organisation.
4. In terms of equalities, an Equality Champion was consulted to consider the Policy and its wider application for the purposes of preventing disadvantage and promoting equality. As part of the wider policy development and approval process, a range of stakeholders were consulted in order to ensure that it reflects SE’s current circumstances and incorporates all applicable requirements and best practice.
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## 3. Assess the likely impact on different groups - (consider these questions to prompt answers)

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|  1. Does your analysis of the evidence indicate any possible adverse impact on a particular group (age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex and sexual orientation) or does it breach human rights legislation. Mandatory human rights due diligence is required for some projects. Please see [guidance](https://scotent.sharepoint.com/sites/Intranet/Corporate/Corporate-cfogroup/Corpmgt-risk/Pages/Due-diligence.aspx). 2.If it is adverse,* Does this amount to unlawful discrimination? (See guidance)

3. In what areas does it have an impact? E.g. access to information, experience of services?**4. Even if there is no evidence of adverse impact, is there an opportunity to** **actively promote equality or foster good relations between different groups?** |

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| 1. Elements of the risk management framework (mainly the risk register template in Excel) use colour to convey priority and it was recognised that this could impact on colleagues who have colour vision deficiency (colour blindness) and present difficulty in viewing any Red/Amber/Green ratings. Colour vision deficiency (colour blindness) is where an individual sees colours differently to most people and has difficulty telling colours apart[[1]](#footnote-2). It affects approximately 1 in 12 men (8%) and 1 in 200 women. In the UK there are approximately 3 million colour blind people (about 4.5% of the entire population), most of whom are male[[2]](#footnote-3). As such, it was recognised in this Equality Impact Assessment that this Policy may have possible impacts in relation to the disability protected group.

These potential negative impacts are, however, mitigated through the use of words or letters within the coloured Excel cells and risk reports so that the meaning/priority that is conveyed by colour is also conveyed by words/letters. This approach is already part of SE's risk register template therefore no further actions are considered necessary in terms of removing any negative impacts on any equality group.1. There is no adverse impact as it is mitigated through the use of words or letters within the coloured Excel cells and risk reports so that the meaning/priority that is conveyed by colour is also conveyed by words/letters.
2. If the use of colour was not mitigated, it would not take account of the potential different needs of colleagues and would therefore impact on colleagues’ experiences of and ability to use the Risk Management Policy and wider risk management framework.
3. There is also potentially an opportunity to actively promote equality and foster good relations between groups through the Risk Management Policy. Whilst the Policy provides a framework for identifying, assessing and managing risks throughout the organisation and is based on applicable requirements/best practice, there are potentially opportunities to consider the accessibility of the Policy for neurodiverse individuals, particularly in view of the lengthiness of the Policy for those individuals who have attention differences. A succinct Policy Summary has been provided at the beginning of the Risk Management Policy however there may be opportunities to provide further support to maximise the accessibility and understandability of the Policy.
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## 4. Consider alternatives - (use these questions to prompt answers)

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| 1. How can you change your proposal in a way that is proportionate, and will* Remove unlawful discrimination or comply with human rights?
* Reduce any adverse impact?
* Advance/promote equality?
* Foster good relations between different groups?
* Help us achieve our published equality outcomes (See guidance)?

2. If there are no actions proposed, can the policy/project still be justified? 3. Can the aims be met in some other way? What can you do now/later?4. If the project involves procuring a service or product is there any scope to encourage suppliers to have a greater focus on equality for example signing up to the Business Pledge? Are there any positive action activities you could consider which might address disadvantage experienced by protected groups, like targeting women owned businesses or applying reserved contracts? Are there any other project specific actions you could state to help with our equality duties e.g. monitoring of uptake of the service to identify under-representation or encouraging certain groups to participate in the project (see guidance)?5. What are you recommending? |

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| 1. As noted in Section 3, there is an opportunity to actively promote equality and foster good relations between groups through the Risk Management Policy. Whilst the Policy provides a framework for identifying, assessing and managing risks throughout the organisation and is based on applicable requirements/best practice, there are potentially opportunities to consider the accessibility of the process/Policy for neurodiverse individuals, particularly in view of the lengthiness of the Policy. A succinct Policy Summary has already been provided at the beginning of the Risk Management Policy however there may be opportunities to provide further support to maximise the accessibility and understandability of the Policy.
2. Where possible, appropriate mitigating actions have already been taken in respect of using the use of colour within the risk management framework and a succinct Policy Summary has already been provided at the beginning of the Risk Management Policy in order to support individuals with attention differences. Further actions are also proposed to support the accessibility of the Policy for neurodiverse individuals. The Risk Management Policy is justified as it supports SE’s ability to comply with the Risk Management requirements of the Scottish Public Finance Manual by providing a framework for identifying, assessing and managing risks throughout the organisation.
3. As noted above, the Risk Management Policy is required in order for SE to comply with the Risk Management requirements of the Scottish Public Finance Manual and all other applicable corporate governance requirements.
4. Not Applicable.
5. Recommendations are:
* the Risk Management Policy to be implemented as it is currently drafted;
* engagement to be undertaken with relevant My Communities group to understand whether there are further opportunities to improvement the accessibility of the Policy for neurodiverse individuals, particularly in view of the lengthiness of the Policy;
* as part of the implementation of the Risk Management Policy, encouragement will be given to colleagues to engage with the Risk Manager in order to gather information on the general efficacy of the Policy, including the impact of the Policy from an equalities perspective.
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## 5. Involve/Consult relevant stakeholders if appropriate - (consider these questions to prompt answers)

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| 1. What are the views of the people who are likely to be affected or who have an interest about * Whether you have identified the right issues?
* Whether you have proposed suitable modifications?
* Whether your proposals will meet their needs?

 2. Should you involve people in the re-design of the policy?3. How will you consult once changes have been made?4. Whom do you need to get views from?(internally/externally)5. What methods will you use? (consider “hard to reach” groups)6. What formats will you use for communicating with different groups? |

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| As outlined within Section 2, in terms of equalities, an Equality Champion was consulted to consider the Policy and its wider application for the purposes of preventing disadvantage and promoting equality. As part of the wider policy development and approval process, a range of relevant stakeholders were consulted in order to ensure that it reflects SE’s current circumstances and incorporates all applicable requirements and best practice. |

## 6. Decide whether to adopt this policy/project - (consider these questions to prompt answers)

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| 1. What were your findings from the consultation/involvement?2. Taking into account all of the data, information, potential impact issues and consultation feedback, what will you recommend? (Choose & state one option)* **Reject the policy** – there is evidence of actual/potential unlawful discrimination or breach of human rights.
* **Accept the policy** – The EIA demonstrates the policy is robust with no adverse impacts and all opportunities to promote equality/foster good relations have been taken.
* **Modify the policy** – Adjust the policy to remove barriers or better promote equality.
* **Continue with the policy** – Issues with the policy have been identified but you wish to continue with the policy. Clearly set out justification for doing this. Compelling reasons will be needed.

3. If the Equality Impact Assessment (EqIA) is on a high-level policy/strategy state here if further EqIAs need to be carried out on projects emanating from the policy/strategy and inform project managers.  |

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| 1. The consultation with the Equality Champion highlighted the opportunity for engagement to be undertaken with relevant My Communities group to understand whether there are opportunities to improvement the accessibility of the Policy for neurodiverse individuals, particularly in view of the lengthiness of the Policy. This has been accepted and will be actioned.
2. Taking into account all of the potential impact issues and consultation feedback, the recommendation of the Risk Manager is to accept the Policy given the importance of SE having a framework in place for identifying, assessing and managing risks throughout the organisation that is based on applicable requirements/best practice.
3. The Risk Management Policy will be reviewed on a regular basis and will reflect feedback and insights gathered on the efficacy the Policy, including from an equalities perspective. as data and information from the use cases is gathered.
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## 7. Make Monitoring (and review) Arrangements - (consider these questions to prompt answers)

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| 1. How will you know what the actual effect of the policy/project is?2. In what ways will you monitor? e.g. continuously or irregularly, quantitative methods such as surveys, qualitative methods such as interviews3. How often will monitoring information be analysed?4. When will you review the policy/project taking into account any monitoring information? |

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| 1. There is currently no specific data gathered in SE on the impact of the Risk Management Policy, however compliance with the requirements of the Policy is monitored by the Risk Manager on an ongoing basis and any issues identified are required to be reported to SE’s Audit and Risk Committee. As part of the roll-out of the updated Risk Management Policy, encouragement will be given to colleagues to engage with the Risk Manager in order to gather information on the overall efficacy of the Policy and on the impact of the Policy from an equalities perspective.
2. Engagement with the Risk Manager will be the main way of monitoring the Risk Management Policy, with feedback and insights captured on an ongoing basis.
3. As noted above, feedback and insights will be captured on an ongoing basis and analysed on a six-monthly basis (unless it is determined that more frequent monitoring is required).
4. Feedback and insights captured on an ongoing basis and analysed on a six-monthly basis (unless it is determined that more frequent monitoring is required). The Risk Management Policy will be reviewed annually (unless there is an emerging requirement to review the Policy more frequently).
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**8. Equality Impact Assessment review**

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| Please forward the completed document to your equality champion for review. This should then be approved by the SRO and returned to your champion for publication on the Scottish Enterprise external website.  |

**9. Summary of Actions**

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| List any actions agreed and indicate dates for review. |

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| As noted in Section 4:* the Risk Management Policy to be implemented as it is currently drafted. This will be done in May 2024;
* engagement to be undertaken with relevant My Communities group to understand whether there are opportunities to improvement the accessibility of the Policy for neurodiverse individuals, particularly in view of the lengthiness of the Policy. This will be added to the Risk Management Work Plan for 2024/25 which is subject to quarterly management review;
* as part of the implementation of the Risk Management Policy, encouragement will be given to colleagues to engage with the Risk Manager in order to gather information on the general efficacy of the Policy, including the impact of the Policy from an equalities perspective. This encouragement will be communicated as part of the implementation of the Policy in May 2024. It is anticipated that this will help to inform the development of the updated Risk Management Policy and enable SE to consider if there is a need or opportunity to eliminate adverse impacts on disadvantaged groups or actively promote equality.
* feedback and insights will be captured on an ongoing basis and analysed on a six-monthly basis (unless it is determined that more frequent monitoring is required)
* the Risk Management Policy will be reviewed annually (unless there is an emerging requirement to review the Policy more frequently).
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1. [Colour vision deficiency (colour blindness) - NHS (www.nhs.uk)](https://www.nhs.uk/conditions/colour-vision-deficiency/) [↑](#footnote-ref-2)
2. [About Colour Blindness - Colour Blind Awareness](https://www.colourblindawareness.org/colour-blindness/) [↑](#footnote-ref-3)