

## Integrated Impact Assessment (IIA)

### Part 1 Scoping

#### 1 Details of the Proposal

<b>Title of Proposal:</b>	Equal Pay Policy
<b>What is it?</b>	A new Policy/Strategy/Practice <input type="checkbox"/> A revised Policy/Strategy/Practice <input checked="" type="checkbox"/>
<b>Description of the proposal:</b> (Set out a clear understanding of the purpose of the proposal being developed or reviewed (what are the aims, objectives and intended outcomes, including the context within which it will operate).	<p>The purpose of this Policy is to state and publicise the Council's commitment to equal pay for equal work for all employees, ensuring they are paid fairly and that the Council operates pay and reward systems which are transparent, based on objective criteria and free from bias.</p> <p>The scope of the policy extends to all Council employees, irrespective of their employment status and length of service.</p> <p>Specifically this includes:</p> <ul style="list-style-type: none"> <li>To commit to the principle of equal pay for equal work for all employees</li> </ul>

	<ul style="list-style-type: none"> <li>• To eliminate any unfair discrimination, unjust or unlawful practices that impact on pay equality</li> <li>• To reward fairly the skills and experience of all employees</li> <li>• To operate pay and reward systems which are transparent, based on objective criteria and free from bias</li> <li>• To secure the future together with our employees by attracting and retaining employees who are committed to delivering excellent public service and making us a dynamic and innovative Council by supporting equality of opportunity and valuing diversity within our workforce.</li> </ul> <p>The policy has been reviewed and developed in line with the Equality and Human Rights Commission (EHRC) Statutory Code of Practice on Equal Pay,.</p> <p>The figures used throughout this assessment are from employee data for December 2020.</p>
<b>Service Area:</b> <b>Department:</b>	Human Resources  People Performance & Change
<b>Lead Officer:</b> (Name and job title)	Iain Davidson Employee Relations Manager
<b>Other Officers/Partners involved:</b> (List names, job titles and organisations)	Ian Angus HR Shared Services Manager
<b>Date(s) IIA completed:</b>	15/06/2022

## 2 Will there be any cumulative impacts as a result of the relationship between this proposal and other policies?

**Yes** *(please delete as applicable)*

**If yes, - please state here:**

- Equality, Diversity and Human Rights
- Recruitment and Selection
- Training and Development

## 3 Legislative Requirements

### 3.1 Relevance to the Equality Duty:

**Do you believe your proposal has any relevance under the Equality Act 2010? Yes**

*(If you believe that your proposal may have some relevance – however small please indicate yes. If there is no effect, please enter “No” and go to Section 3.2.)*

**Equality Duty**

**Reasoning:**

**Elimination of discrimination (both direct & indirect), victimisation and harassment.** *(Will the proposal discriminate? Or help eliminate discrimination?)*

This Policy serves to meet the equality duty of eliminating discrimination, victimisation and harassment

**Promotion of equality of opportunity?**  
*(Will your proposal help or hinder the Council with this)*

This Policy will promote equality of opportunity as it sets out the Council's commitment to equal pay for equal work for all employees, ensuring they are paid fairly and that the Council operates pay and

	reward systems which are transparent, based on objective criteria and free from bias.
<b>Foster good relations?</b> <i>(Will your proposal help or hinder the council's relationships with those who have equality characteristics?)</i>	As the Policy is readily available, widely publicised and promoted to all staff this should assist in fostering good relations ' between groups with different protected characteristics

<b>3.2 Which groups of people do you think will be or potentially could be, impacted by the implementation of this proposal? (You should consider employees, clients, customers / service users, and any other relevant groups)</b>				
Please tick below as appropriate, outlining any potential impacts on the undernoted equality groups this proposal may have and how you know this.				
	Impact			Please explain the potential impacts and how you know this
	No Impact	Positive Impact	Negative Impact	
<b>Age</b> Older or younger people or a specific age grouping		X		Workforce data shows that 10.38% of employees are aged 29 years or under, whilst there are 66.04% of employees aged over 45. Consequently, there is a relatively high amount of older employees.  The principles contained in the policy contribute to the promotion of equal pay for equal work regardless of protected characteristic.
<b>Disability</b> e.g. Effects on people with mental, physical, sensory impairment, learning disability, visible/invisible, progressive or recurring		X		2.57% of Council employees have declared that they have a disability. Approximately 72.5% of employees have not provided information about this protected characteristic (no response or not stated). These figures are too small to undertake meaningful analysis.

				However, the principles contained in the policy contribute to the promotion of equal pay for equal work regardless of protected characteristic.
<b>Gender Reassignment Trans/Transgender Identity</b> anybody whose gender identity or gender expression is different to the sex assigned to them at birth	X			
<b>Marriage or Civil Partnership</b> people who are married or in a civil partnership	X			
<b>Pregnancy and Maternity</b> (refers to the period after the birth, and is linked to <b>maternity</b> leave in the employment context. In the non-work context, <b>protection</b> against <b>maternity</b> discrimination is for 26 weeks after giving birth),	X			
<b>Race Groups:</b> including colour, nationality, ethnic origins, including minorities (e.g. gypsy travellers, refugees, migrants and asylum seekers)		X		Almost 75% of employees have declared their ethnic origin. 73.77% are White and 0.55% Black/ Minority Ethnic. These figures are too small to undertake meaningful analysis. However, the principles contained in the policy contribute to the promotion of equal pay for equal work regardless of protected characteristic.
<b>Religion or Belief:</b> different beliefs, customs (including atheists and those with no aligned belief)	X			
<b>Sex</b> women and men (girls and boys)				74.39% of employees are female and 25.61% male.  The gender pay gap is the difference between men and women's hourly earnings.

				<p>Using guidance and the standard calculation that is set out by the Equality and Human Rights Commission, the Council's equal pay gap was calculated using data as at 31 December 2020.</p> <p><u>Chief Officers and Single Status Staff</u></p> <ul style="list-style-type: none"> <li>• The average hourly rate for women is £12.68</li> <li>• The average hourly rate for men is £14.34)</li> <li>• The difference in hourly pay is £ 1.66</li> <li>• This means that on average women earn 11.57% less than men</li> </ul> <p><u>Teaching Staff</u></p> <ul style="list-style-type: none"> <li>• The average hourly rate for females is £26.26</li> <li>• The average hourly rate for males is £27.00</li> <li>• The difference in hourly pay is £1.26</li> <li>• This means that on average women in Education earn 2.76% less than men.</li> </ul> <p>The policy includes a commitment to undertake regular equal pay audits and conduct appropriate analysis. This will allow appropriate action to be taken to address the gender pay gap.</p>
<b>Sexual Orientation</b> , e.g. Lesbian, Gay, Bisexual, Heterosexual	X			
<p><b>3.3 Fairer Scotland Duty</b></p> <p>This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) to how we can reduce inequalities of outcome caused by socioeconomic disadvantage when making <u>strategic</u> decisions.</p> <p>The duty is set at a strategic level - these are the key, high level decisions that SBC will take. This would normally include strategy documents, decisions about setting priorities, allocating resources and commissioning services.</p>				

<p><b>Is the proposal strategic?</b>          Yes <i>(please delete as applicable)</i>  <b>If No go to Section 4</b></p>				
<p><b>If yes, please indicate any potential impact on the undernoted groups this proposal may have and how you know this:</b></p>				
	<b>Impact</b>			<b>State here how you know this</b>
	<b>No Impact</b>	<b>Positive Impact</b>	<b>Negative Impact</b>	
<b>Low and/or No Wealth</b> – enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future.		X		The commitment to equal pay for equal work means that employees are paid appropriately.
<b>Material Deprivation</b> – being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies		X		The commitment to equal pay for equal work means that employees are paid appropriately.
<b>Area Deprivation</b> – where you live (e.g. rural areas), where you work (e.g. accessibility of transport)	X			
<b>Socio-economic Background</b> – social class i.e. parents' education, employment and income		X		The commitment to equal pay for equal work means that employees are paid appropriately regardless of socio – economic background.

<b>Looked after and accommodated children and young people</b>	X			
<b>Carers</b> paid and unpaid including family members	X			
<b>Homelessness</b>	X			
<b>Addictions and substance use</b>	X			
<b>Those involved within the criminal justice system</b>	X			



#### 4 Full Integrated Impact Assessment Required

Select No if you have answered “No” to all of Sections 3.1 – 3.3.

**No** (please delete as applicable)

**If a full impact assessment is not required briefly explain why there are no effects and provide justification for the decision.**

The review of this policy has found that the impact of this policy is positive. Awareness and implementation of the policy will greatly reduce the risk of discrimination, harassment or victimisation for all potential and existing employees of SBC. In order to ensure that the policy remains relevant and fit for purpose the policy will be reviewed at least every two years in accordance with the Council’s HR Policy Review Programme and the following actions will be undertaken:

- Continue to encourage the collection of equal opportunities monitoring data of all employees to allow meaningful analysis for employees who are disabled and those who are not and employees who fall into a minority racial group and those who do not.
- Conduct Equal Pay Audits for all employees and monitor the application of the Equal Pay Policy using appropriate resources

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<b>Signed by Lead Officer:</b>	<b>Iain Davidson</b>
<b>Designation:</b>	<b>Employee Relations Manager</b>
<b>Date:</b>	<b>15/06/2022</b>

<b>Counter Signature Director</b>	<b>Clair Hepburn</b>
<b>Date:</b>	<b>17/06/2022</b>

## Part 2 Full Integrated Impact Assessment

### 5 Data and Information

#### **What evidence has been used to inform this proposal?**

(Information can include, for example, surveys, databases, focus groups, in-depth interviews, pilot projects, reviews of complaints made, user feedback, academic publications and consultants' reports).

Please state your answer here

**Describe any gaps in the available evidence,-then record this within the improvement plan together with all of the actions you are taking in relation to this** (e.g. new research, further analysis, and when this is planned)

Please state your answer here

## 6 Consultation and Involvement

**Which groups are involved in this process and describe their involvement**

Please state your answer here

**Describe any planned involvement saying when this will take place and who is responsible for managing the process**

Please state your answer here

**Describe the results of any involvement and how you have taken this into account.**

Please state your answer here

**What have you learned from the evidence you have and the involvement undertaken? Does the initial assessment remain valid?**

**What new (if any) impacts have become evident?**

(Describe the conclusion(s) you have reached from the evidence, and state where the information can be found.)

Please state your answer here

## 7 Mitigating Actions and Recommendations

Consider whether:

Could you modify the proposal to eliminate discrimination or reduce any identified negative impacts?  
(If necessary, consider other ways in which you could meet the aims and objectives of the proposal.)

Could you modify the proposal to increase equality and, if relevant, reduce poverty and socioeconomic disadvantage?

Describe any modifications which you can make without further delay (e.g. easy, few resource implications)

<b>Mitigation</b> Please summarise all mitigations for approval by the decision makers who will approve your proposal			
<b>Equality Characteristic/Socio economic factor</b>	<b>Mitigation</b>	<b>Resource Implications (financial, people, health, property etc)</b>	<b>Approved Yes/No</b>

## 8 Recommendation and Reasoning *(select which applies)*

- Implement proposal with no amendments
- Implement proposal taking account of mitigating actions (as outlined above)
- Reject proposal due to disproportionate impact on equality, poverty, health and Socio-economic disadvantage

<b>Reason for recommendation:</b>
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<b>Signed by Lead Officer:</b>	
<b>Designation:</b>	
<b>Date:</b>	
<b>Counter Signature (Service Director):</b>	
<b>Date:</b>	

**Office Use Only (not for publication)**

This assessment should be presented to those making a decision about the progression of your proposal.

If it is agreed that your proposal will progress, you must send an electronic copy to corporate communications to publish on the webpage within 3 weeks of the decision.

Complete the below two sections. For your records, please keep a copy of this Integrated Impact Assessment form.

### Action Plan (complete if required)

<b>Actioner Name:</b>	<b>Action Date:</b>
<b>What is the issue?</b>	
<b>What action will be taken?</b>	
<b>Progress against the action:</b>	
<b>Action completed:</b>	<b>Date completed:</b>

### Monitoring and Review

State how the implementation and impact of the proposal will be monitored, including implementation of any amendments? For example what type of monitoring will there be? How frequent?

Please state your answer here
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**What are the practical arrangements for monitoring? For example who will put this in place? When will it start?**

Please state your answer here

**When is the proposal due for review?**

Please state your answer here

**Who is responsible for ensuring that this happens?**

Please state your answer here