

## Equality Impact Assessment [\(supporting guidance available\)](#)

### Action Plan

This section is completed at the end of the Equality Impact Assessment. Due to the importance of embedding equality in SQA through our actions the Action Plan will be the focus and record of ongoing actions.

<b>Agreed Schedule Review Date</b>	<b>1 April 2023</b>	<b>Additional Schedule Review Date</b>	
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**Explain how you will monitor and record the actual impact on equality groups, including how the evidence can be revisited to measure the actual impact.**

<b>Required Actions</b>	<b>Owner</b>	<b>Date</b>	<b>Comment &amp; Review</b>
Actions taken to <b>monitor the implementation of policy and the impact on equality groups</b> (evidence and consultation)			<b>[ONGOING RECORD]</b>
<b>[LIST]</b>			
We will review impact of policy across all groups on a 3- month basis to align with Smarter Working programme and Return Office initiatives. Then on a 12-month basis from date of initial EQIA being published.	<b>OD &amp; Change Manager</b>	<b>Cancelled</b>	Action no longer applicable as SW has not brought expected no of colleagues back to the office environment to allow an exploration of impact on a hybrid environment with majority of colleagues still working from home.
We will evaluate the impact of policy across all groups of colleagues in advance of annual policy review in April 2023. This includes with Employee Networks, Trade Union representatives and a cross section of colleagues from all directorates.	<b>Employee Development Programme Manager</b>	<b>Beginning 01.03.2023 and ending 01.04.2023</b>	
We will use the evaluation data to identify areas of the policy that can be improved. We will also explore any suggestions for improvement from colleagues as a realistic and effective solution.	<b>Employee Development Programme Manager</b>	<b>Beginning 01.04.2023 and ending 30.04.2023</b>	
We will launch an improved (if required) version of the policy 01.05.2023 in line with the My Review process.	<b>Employee Development Programme Manager</b>	<b>01.05.2023</b>	

<b>Identified Actions</b>	<b>General Equality Duty</b>	<b>Owner</b>	<b>Date</b>	<b>Comment &amp; Review</b>
[LIST]	[CROSS REFERENCE]			
Although equality monitoring data will not be used in the decision-making process to approve development request, we will explore how to collect and analyse equality monitoring data of those who have taken development activity, using Business World and where we can use this data within further EQIA.	<b>Eliminate unlawful discrimination</b>	<b>Employee Development Programme Manager</b>	<b>01.05.2023</b>	To be applied once the new version of the policy is live and the new development year begins in order to be fair and consistent with current process.
Once the % of the organisation has who indicated they would like to continue working from home after a return to the office is confirmed we will review the learning provision and access to learning as hybrid working may require provision and access to learning and development to be widened.	<b>Promote Equality of Opportunity</b>	<b>Employee Development Programme Manager</b>	<b>TBC</b>	Can only be started when the organisation is working a hybrid scenario.
Engagement with Staff Diversity Networks on the content and operation of this policy ahead of the publication of the next policy	<b>Foster Good Relations, Eliminate Unlawful Discrimination</b>	<b>Employee Development Programme Manager</b>	<b>01.05.2023</b>	

## Policy Aims

<b>Name of Policy or practice</b>	Learning and Development ('L&D' Policy)
<b>New Policy or Revision</b>	Revision
<b>Name of Policy Owner</b>	Head of OD & Change Management
<b>Date Policy Owner Confirmed Completion</b>	April 2022

<b>What is the rationale for this policy or practice?</b>
<p>The L&amp;D Policy has two aims:</p> <ul style="list-style-type: none"> <li>• Confirm how all colleagues can access learning and development while employed by SQA.</li> <li>• Confirm how learning and development will be financially supported by SQA.</li> </ul>
<b>What evidence is there to support the implementation or development of this policy or practice?</b>
<p><b><u>Access to learning and development.</u></b></p> <p>There are approx. 23% more employees working with SQA and four new Directorates since the last update to this policy in 2010. For this reason, the policy has been updated with an explanation of how to access informal and formal learning solutions to better meet the needs of a flexible working culture. We have also increased our use of SQA Academy to host on demand learning that reflects the new skillsets and capabilities of employees and widened the scope of learning and development solutions that will be financially supported to meet the needs of a larger workforce.</p> <p>Currently there are 130 part-time employees with 111 being female. For this reason, the new policy will confirm that development interventions will be offered across the working week to ensure part-time employees have the same access as full-time employees and as these employees are predominantly female, the additional provision will ensure females are not disproportionately impacted by access to development.</p> <p><b><u>Financial Support</u></b></p> <p>Recent feedback from users of the current policy stated they felt there was a lack of clarity on eligibility for financial support which meant some colleagues received financial support on a first come first served basis and other colleagues missed the opportunity. For this reason, the new policy clearly confirms the types of learning where financial support is available, and that funding required to enable the use of education around any adaptations made for disabilities will be separate from the core budget so that it can be available when required.</p>

Feedback was received from four employees that a criterion of when financial support for accredited qualifications available, and which qualifications are covered, would be helpful in ensuring transparency around financial decisions based on development need. For this reason, the new version has a criterion that demonstrates what qualifications are covered by financial support from SQA, the request and decision-making process and when the support should be requested to ensure clarity and transparency.

Since the original policy was created there is now a 1-year apprenticeship programme in place. For this reason, the requirement to have been employed by SQA for 12 months before gaining access to financial support has been removed.

There are also currently 80 disabled employees compared with 9 in 2011. For this reason, the policy now includes explicit provision for access to learning to use adaptive equipment. To date one person has requested access to learning how to use adaptive equipment. The request is raised by HR as they are responsible for identifying the equipment is required under the reasonable adjustments' responsibility and OD and Change Management are responsible for providing education to use the identified adaptation.

#### **What are the aims of this policy or practice?**

The L&D Policy has two aims:

- Confirm how all colleagues can access learning and development while employed by SQA.
- Confirm how learning and development will be financially supported by SQA.

#### **How is the content of these aims relevant to equality groups?**

As the policy only applies to those already within SQA, we are not seeking feedback from any external agencies. We are consulting with SQA employee networks, Trade Unions, HR policy working group and a cross section of policy users from across the organisation.

The impact of the policy will be evaluated through an increase in positive scores from the learning and development questions on the annual people survey. Once we have access to equality monitoring data and provision of learning solutions, we can monitor access to development through comparing those reports with development record reports from My Review to demonstrate an increase in development has been accessed across different grades, business areas and protected characteristics.

## Evidence, Consultation and Engagement

### What stakeholders have you engaged with in the development of this policy or practice?

This policy is in draft and there is a short review timescale to review this document once the policy is live and in operation. The policy itself must go through the HR defined process which includes consultation with trade unions and staff networks. This process will help identify any potential areas which could be altered to help better meet our equality duty. These same groups will also be consulted on the best way to inform/educate staff on the new policy.

We are consulting with SQA employee networks, Trade Unions, and a cross section of policy users from across the organisation – see above. The policy will be reviewed annually on a schedule commencing once this EQIA is published and every 12 months after that date.

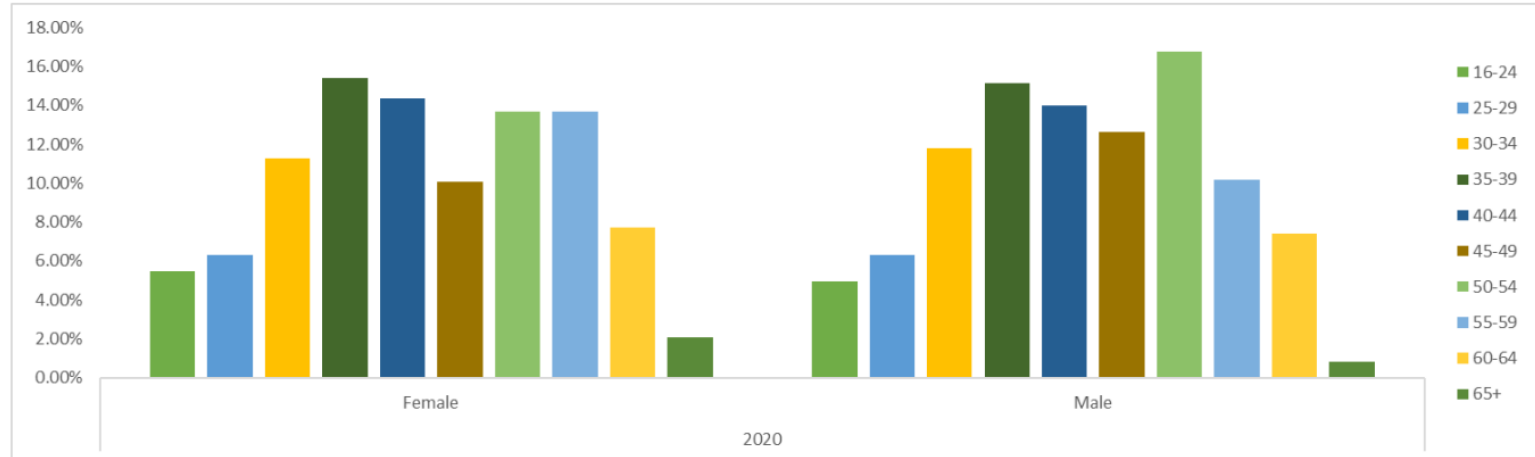
#### Internal Evidence Sources:

- Lessons learned from existing processes,
- Feedback from employees,
- Previous complaints,
- Feedback from SQA's union representatives,

### What evidence about equality groups do you have to support this assessment? Brynley Pearlstone

#### Age

Colleagues by age band and gender (sex) 2020 (as in Table 1.05)



The majority of SQA employees are in the mid-range age bandings. A total of 79% workers are aged between 30 – 59. Less than 2% of SQA employees are aged 60+ and the SQA has recently seen a decrease in younger (under 35) employees.

Comparisons between 2019 and 2020 data show that the greatest increase in the proportion of female colleagues is within the 60–64 age band - an increase of 12 colleagues.

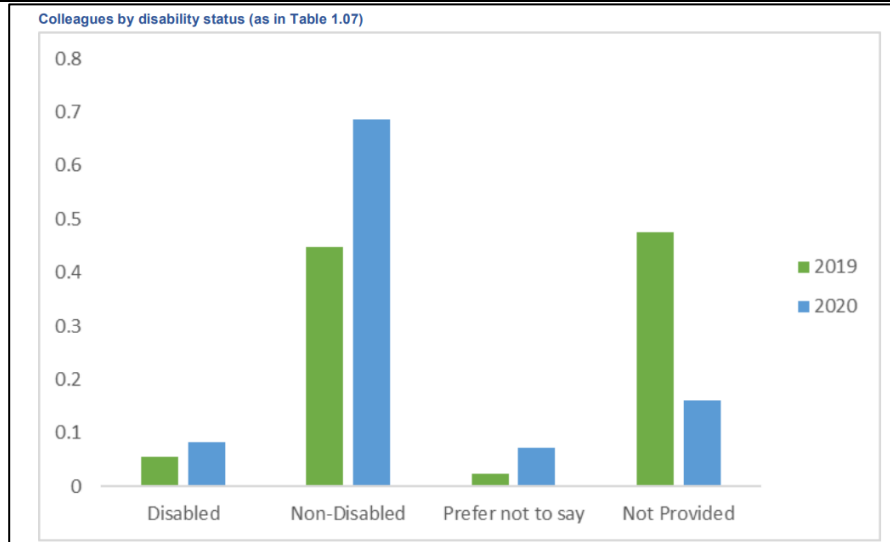
The 30–34 age band saw the largest reduction of female colleagues – a total of seven people. Over the same period, there was an increase in the proportion of male colleagues within the 50-54 age band - an overall increase of nine people. The largest decline in the proportion of male colleagues was in the 30-34 age band, with seven fewer people. The largest decrease was seen in the 30–34 age band for both male and female colleagues - with an overall reduction of 14 people.

Source: SQA Workforce Equality Monitoring Report 2019 – 2021

The updated policy removed the requirement for 12-months service before access to paid for training would be provided to remove a barrier for colleagues in the 16-24 age group who are currently employed by SQA as Apprentices – Modern and Graduate.

All colleagues have an equal opportunity to request access to learning and development as per the policy and My Review process. Current training data held by the OD & Change Management team is not currently analysed in relation to the overall workforce monitoring data. An action will be taken to explore how this data can be captured in the future.

## Disability



The highest proportion of colleagues who have declared a disability (53%) falls within the lowest age bands (16 – 44) and second highest (47%) within the upper age bands (45–64)

A total of 55% of disabled employees are female and 45% are male. 63% of colleagues who have declared a disability are within the grade range 06 to Head of Service. Head of Service has the largest **percentage** of colleagues declaring a disability (13%) whereas Grade 6 has the largest overall **number** of colleagues declaring a disability at 23%.

Source: SQA Workforce Equality Monitoring Report 2019 – 2021

All colleagues have an equal opportunity to request access to learning and development as per the policy and My Review process. Current training data held by the OD & Change Management team is not currently analysed in relation to the overall workforce monitoring data. An action will be taken to explore how this data can be captured in the future.



# Race

Race	2019	2020	Variance
<b>Ethnic Minority</b>	1.82%	3.16%	<b>1.34%</b>
<b>White</b>	56.06%	80.40%	<b>24.34%</b>
<b>Prefer Not to Say</b>	1.07%	3.48%	<b>2.41%</b>
<b>Not Provided</b>	41.05%	12.96%	<b>-28.09%</b>
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	

Colleagues by Race (as in table 1.12)

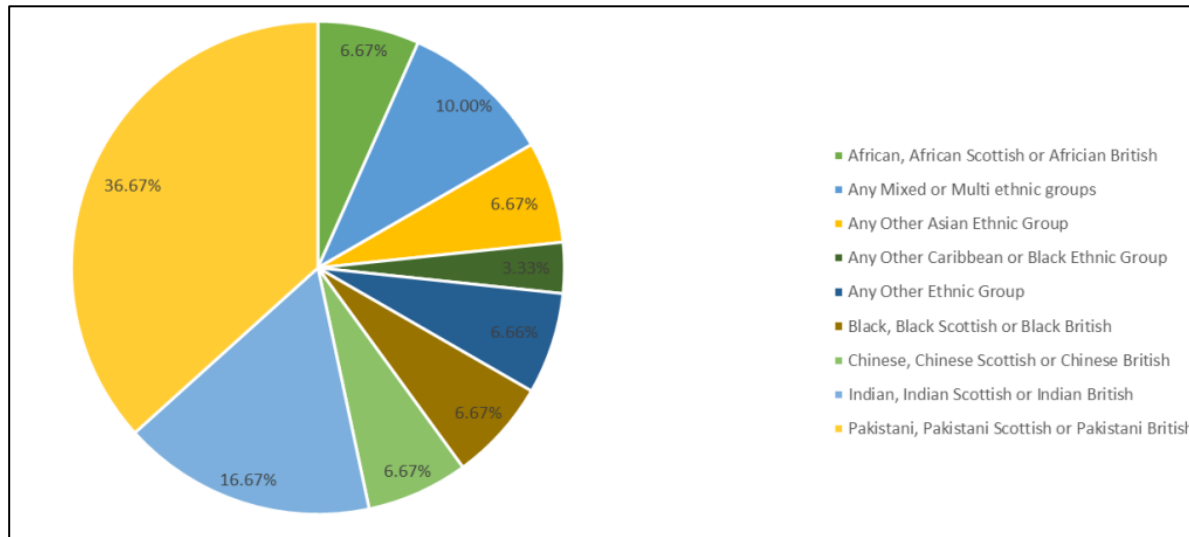
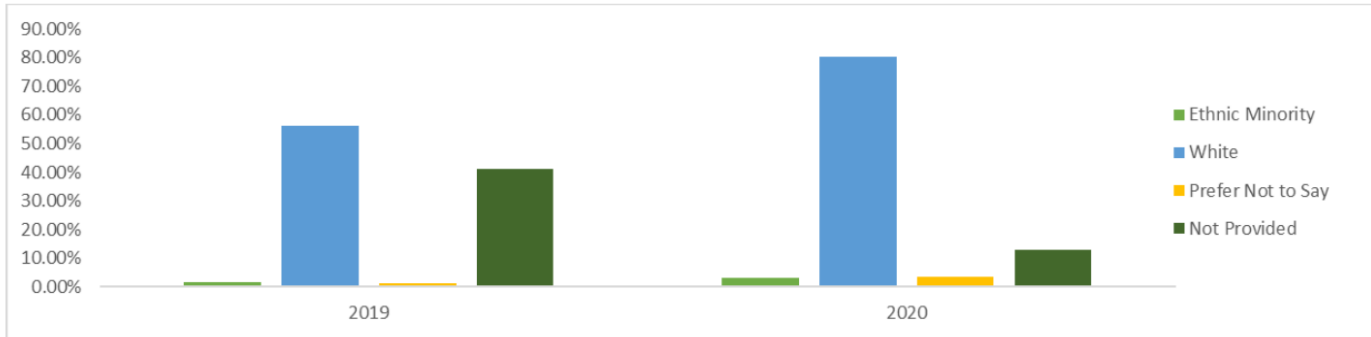


Table 1.15 Race: Colleagues by black and minority ethnicities

Black and Minority Ethnicities	2019	2020	Variance
African, African Scottish or African British	5.88%	6.67%	0.78%
Any Mixed or Multi ethnic groups	11.76%	10.00%	-1.76%
Any Other Asian Ethnic Group	5.88%	6.67%	0.78%
Any Other Caribbean or Black Ethnic Group		3.33%	3.33%
Any Other Ethnic Group		6.66%	6.66%
Black, Black Scottish or Black British	5.88%	6.67%	0.78%
Chinese, Chinese Scottish or Chinese British	11.76%	6.67%	-5.10%
Indian, Indian Scottish or Indian British	17.65%	16.67%	-0.98%
Pakistani, Pakistani Scottish or Pakistani British	41.18%	36.67%	-4.51%
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	

Currently only 3% of SQA employees declared themselves as Minority Ethnicity against a national (Scotland) average of 5%.

A further breakdown of ethnicity (overleaf) indicates that *Chinese, Indian and Mixed Ethnicity* groups are currently the predominant minority ethnicities in the SQA.

Source: SQA Workforce Equality Monitoring Report 2019 – 2021

All colleagues have an equal opportunity to request access to learning and development as per the policy and My Review process. Current training data held by the OD & Change Management team is not currently analysed in relation to the overall workforce monitoring data. An action will be taken to explore how this data can be captured in the future.

**Religion or Belief**

Religion or Belief	2019	2020	Variance
Christian	20.69%	29.82%	9.13%
Non-Christian	11.47%	17.28%	5.81%
None	20.69%	29.29%	8.61%
Prefer not to say	3.75%	10.33%	6.58%
Not Provided	43.41%	13.28%	-30.13%
<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	

An improved declaration rate was also shown for this characteristic in 2020. *Christian* and *No Religion* account for nearly 60% of all responses.

Source: SQA Workforce Equality Monitoring Report 2019 – 2021

All colleagues have an equal opportunity to request access to learning and development as per the policy and My Review process. Current training data held by the OD & Change Management team is not currently analysed in relation to the overall workforce monitoring data. An action will be taken to explore how this data can be captured in the future.

**Sex**

Grade	Date	Number of Colleagues	%age Female	%age Male
1	31-Jan-21	7	85.71%	14.29%
3	31-Jan-21	8	87.50%	12.50%
4	31-Jan-21	25	92.00%	8.00%
5	31-Jan-21	11	100.00%	0.00%
6	31-Jan-21	25	96.00%	4.00%
7	31-Jan-21	17	82.35%	17.65%
8	31-Jan-21	30	73.33%	26.67%
HoS	31-Jan-21	0	N/A	N/A
<b>Total</b>	<b>31-Jan-21</b>	<b>123</b>	<b>86.99%</b>	<b>13.01%</b>

**Percentage of male and female part-time colleagues:**

Grade	Gender (Sex)					
	Female			Male		
	2019	2020	Variance	2019	2020	Variance
<b>1</b>	83.33%	66.67%	<b>-16.67%</b>	16.67%	33.33%	<b>16.67%</b>
<b>3</b>	65.15%	65.00%	<b>-0.15%</b>	34.85%	35.00%	<b>0.15%</b>
<b>4</b>	63.28%	64.71%	<b>1.43%</b>	36.72%	35.29%	<b>-1.43%</b>
<b>5</b>	58.02%	61.54%	<b>3.51%</b>	41.98%	38.46%	<b>-3.51%</b>
<b>6</b>	69.90%	69.90%		30.10%	30.10%	
<b>7</b>	59.76%	57.89%	<b>-1.86%</b>	40.24%	42.11%	<b>1.86%</b>
<b>8</b>	53.54%	56.34%	<b>2.80%</b>	46.46%	43.66%	<b>-2.80%</b>
<b>HOS</b>	39.39%	40.00%	<b>0.61%</b>	60.61%	60.00%	<b>-0.61%</b>
<b>EMT</b>	57.14%	42.86%		57.14%	42.86%	
<b>Total</b>	<b>61.20%</b>	<b>61.64%</b>	<b>0.44%</b>	<b>38.80%</b>	<b>38.36%</b>	<b>-0.44%</b>

A greater number of SQA employees overall are female - 62% female versus 38% male. A 60% representation of females across most grades is evident with a decrease to circa 40% for more senior grades.

Source: SQA Workforce Equality Monitoring Report 2019 – 2021

As per the policy, courses and internal learning solutions are delivered throughout the week, on varying days and at varying times to support part-time colleagues and allow them the same access to learning and development as full-time colleagues. A flexible approach is taken within OD & Change Management and dates/time are changed to accommodate the range of working patterns across the SQA.

All colleagues have an equal opportunity to request access to learning and development as per the policy and My Review process. Current training data held by the OD & Change Management team is not currently analysed in relation to the overall workforce monitoring data. An action will be taken to explore how this data can be captured in the future.

<b>Sexual Orientation</b>	<b>Sexual Orientation</b>	<b>2019</b>	<b>2020</b>	<b>Variance</b>
	<b>Bisexual</b>	0.96%	1.26%	<b>0.30%</b>
	<b>Gay man</b>	1.39%	2.11%	<b>0.71%</b>
	<b>Gay woman / Lesbian</b>	0.96%	1.05%	<b>0.09%</b>
	<b>Heterosexual/straight</b>	46.20%	70.60%	<b>24.41%</b>
	<b>In another way</b>	0.11%	0.21%	<b>0.10%</b>
	<b>Not sure</b>	0.11%	0.11%	<b>0.00%</b>
	<b>Prefer not to say</b>	2.79%	8.01%	<b>5.22%</b>
	<b>Not Provided</b>	47.48%	16.65%	<b>-30.83%</b>
	<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	
	All colleagues have an equal opportunity to request access to learning and development as per the policy and My Review process. Current training data held by the OD & Change Management team is not currently analysed in relation to the overall workforce monitoring data. An action will be taken to explore how this data can be captured in the future.			
<b>Gender Re-assignment (Gender identity and transgender)</b>	No equality profiling data is currently published by SQA. The data is, however, captured. The low response rate to certain answers in the question may risk identification of certain people.			
<b>Marriage/Civil Partnership</b>	No equality profiling data is currently published by SQA. The data is, however, captured.			
<b>Pregnancy / Maternity</b>		<b>Colleagues</b>		
	<b>Pregnancy Status</b>	<b>2019</b>	<b>2020</b>	<b>Variance</b>
	<b>Not Pregnant</b>	98.25%	98.95%	<b>0.70%</b>
	<b>Pregnant</b>	1.75%	1.05%	<b>-0.70%</b>
	<b>Total</b>	<b>100.00%</b>	<b>100.00%</b>	
	In 2020, 1.05% of colleagues reported being pregnant.			
	Source: SQA Workforce Equality Monitoring Report 2019 – 2021			

	<p>Colleagues returning from maternity leave have the same access to the SQA Induction Programme as new colleagues under the current provision.</p> <p>All colleagues have an equal opportunity to request access to learning and development as per the policy and My Review process. Current training data held by the OD &amp; Change Management team is not currently analysed in relation to the overall workforce monitoring data. An action will be taken to explore how this data can be captured in the future.</p>
<b>Care experience (where relevant)</b>	No equality profiling data is currently captured by the SQA.

## Impact and Opportunities for Action

The impact that a policy or practice has on an equality group may be different and this requires to be recorded. The impact may not always be negative. Actions are taken to address any differential impact, and include actions to mitigate against any negative impact, to advance equality and to foster good relations between groups.

Each section contains questions for each equality group. These questions are here to support consideration; however, you can provide further detail. Focus initially on the equality groups that would be affected by this policy. If you do not consider that certain equality groups would be affected by this policy, you may leave these sections.

Protected Characteristic	General Equality Duty
Age	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>We have removed the requirement to have been employed by SQA for 12 months before gaining access to financial support as this may negatively impact on younger employees who are more likely to join the organisation as participants on the one-year apprenticeship programme.</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>
	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
Protected Characteristic	General Equality Duty
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>

	<b>Advance equality of opportunity</b>
	<ul style="list-style-type: none"> <li>As we do not collect equality monitoring data of those who have undertaken personal or professional development through SQA, we cannot assess the impact of the provision on the protected characteristic.</li> <li>However, there is explicit provision in the policy for access to learning to use adaptive equipment, broadening engagement for disabled staff.</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>
	<b>Foster good relations</b>
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Race</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>
	<b>Advance equality of opportunity</b>
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	<b>Foster good relations</b>
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Religion or Belief</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>



	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Sex</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>The updated policy will confirm that development interventions will be offered across the working week to ensure part-time employees have the same access as full-time employees and as these employees are predominantly female, the additional provision will ensure females are not disproportionately impacted by access to development.</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data.</li> </ul>
	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Sexual Orientation</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>

	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Gender Re-assignment (Gender identity and transgender)</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>Due to the low numbers of staff reporting gender reassignment, SQA do not publish this data, and the data will not show useful discrepancies.</li> <li>Consulting with the Rainbow Network provides key insight from trans employees. Action has been taken to consult with staff networks on this policy.</li> </ul>
	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Marriage/Civil Partnership</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>No impacts identified</li> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>
	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations

	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Pregnancy / Maternity</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>
	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations
	<ul style="list-style-type: none"> <li>The policy has increased provision for induction for those returning from maternity leave, to effectively welcome them back into the workforce, which is a positive impact towards fostering good relations.</li> </ul>
<b>Considered by SQA</b>	
<b>Care experience (where relevant)</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<ul style="list-style-type: none"> <li>As we do not collect equality monitoring data, we cannot assess the impact of the provision on the protected characteristic.</li> </ul>
	<ul style="list-style-type: none"> <li>We will explore with People, Analytics and Governance (PAGS) the inclusion of analysis of the training data currently held by OD &amp; Change Management in relation to workforce monitoring data</li> </ul>
	Advance equality of opportunity
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>
	Foster good relations
	<ul style="list-style-type: none"> <li>No impacts identified</li> </ul>

**Rationale**

If you are proceeding with a decision that may have a negative impact and are not putting in place actions to mitigate against this, please explain how this is objectively justified.