

Equality Impact Assessment

Summary

Name of Policy or practice	Relocation Policy		
New Policy or Revision	Revised		
Policy Owner (role)	Head of Human Resources		
Date Policy Owner Confirmed Completion	October 2024		
Agreed Schedule Review Date	October 2027	Additional review date (Action review date)	October 2027

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.

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.

Required Actions	Owner	Date	Comment & Review
Review and assess monthly establishment management information packs containing fundamental employment data on SQA employees	People Analytics, Governance & Systems Manager	Commencing monthly from October 2022	Part of business-as-usual work. Action item closed.
Review on a quarterly basis of employment law, case law and legislative changes, and equalities updates (including reviewing EHRC website)	HR Shared Services Manager	Commencing quarterly from January 2023	Part of business-as-usual work. Action item closed.
Review and assess feedback on a quarterly basis from joint trade unions (Unite and Unison) through SQA's Joint engagement forum and Policy review group	HR Shared Services Manager	Commencing quarterly from January 2023	Part of business-as-usual work. Action item closed.
Review and assess feedback on a quarterly basis from each of SQA's staff community network groups	HR Shared Services Manager	Commencing quarterly from January 2023	Part of business-as-usual work. Action item closed.
Continue to review and assess on an annual basis SQA's engagement People survey	OD Manager	Commencing annually from October 2023	Part of business-as-usual work. Action item closed.
Review and assess on an annual basis all SQA employee lifecycle data	People Analytics, Governance & Systems Manager	Commencing annually from January 2024	Part of business-as-usual work. Action item closed.
Continue to review and assess every 2 years SQA's equality mainstreaming report [next report due May 2023]	People Reward and Equalities Manager	Commencing every 2 years from May 2023	Part of business-as-usual work. Action item closed.

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
<p>Amend page one of the policy to read:</p> <p><i>May be subject to change in line with changes to HMRC Guidelines. Further support may be available to provide specialist accommodation or equipment to meet the needs of SQA employees who have a Disability.</i></p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>	<p>Reward Advisor, People Reward & Equalities</p>	<p>By December 2022</p>	<p>Action completed. However, this has now been superseded by changes to the updated policy replacing this with Section 2.8 Personal circumstances which reads:</p> <p><i>If any aspect of this policy causes you difficulty including in relation to a disability you should inform HR Shared Service or your line manager. We will take any reasonable steps to support your needs when relocating.</i></p>

Policy Aims

What is the rationale for this policy or practice?
In order to attract, recruit and retain the best talent, SQA may at times have to offer some financial assistance for a colleague to relocate to take up employment with SQA.
What evidence is there to support the implementation or development of this policy or practice?
<p>This policy applies to newly appointed SQA employees who move to take up their post. Employees may be considered for relocation assistance if they meet the eligibility criteria outlined below: -</p> <ul style="list-style-type: none"> • they will be fulfilling a role where recruitment from the local area would not normally provide a sufficient applicant pool for consideration and there is consequently a need to recruit from the national labour market • the initial appointment is for 24 months or longer. <p>For information: 0.49% of SQA employees have used this policy since 2008 – a very small sample size. No equality data exists e.g. Age, Disability, Sex etc in respect of the above five people – ultimately preventing any form of accurate Equality analysis in respect of the implementation of this policy. A further analysis of national information relating to relocation – including relocation policy Equality Impact Assessments published by different UK organisations remains wholly inconclusive.</p>
What are the aims of this policy or practice?
<p>In order to attract, recruit and retain the best available talent, SQA may offer a relocation package to support new colleagues who may have to relocate to take up employment with SQA. The relocation package is offered as a contribution towards costs incurred, and is designed to be flexible, allowing new colleagues to use the financial support available in the way that will be most helpful to them, in line with HMRC guidelines.</p> <p>The policy itself is divided into two discrete sections:</p> <p>Policy Structure:</p> <p>1: Part A – Policy detail.</p> <p>2: Part B – Procedures for SQA managers / employees to follow.</p> <p>The following SQA policies are also related to the Relocation Policy:</p>

- Code of Conduct
- Disciplinary Policy
- Recruitment and Selection Policy
- Staff Leave Policy
- Travel, Accommodation and Expenses Policy and Guidance

Equality Impact Assessments for related policies have been undertaken.

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

SQA acknowledges that people who share / do not share, certain Protected Characteristics may, on balance:

- Be less likely to relocate and therefore be able to take advantage of the relocation package. For example, those who are younger may be less financially established and therefore renting property rather than being a homeowner and those who are disabled may be less likely to apply for a role which would require them to relocate.

The development, implementation and analysis of the effects of this policy are therefore relevant to a small group of people from some Equality groups as they may risk experiencing disproportionate impacts or outcomes.

It is important that SQA identifies and takes action to mitigate or remove any disadvantage identified which is the overall purpose of this Equality Impact Assessment.

Evidence, Consultation and Engagement

What stakeholders have you engaged with in the development of this policy or practice?
<p>Evidence of all meeting minutes, actions and consultation undertaken with the PRG group (including Equality considerations in respect of all policies, activities and functions) is detailed on a dedicated SQA shared resources site.</p>

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

Age

Table 1.1: Age

Age bracket	2019 no	2019 %	2020 no	2020 %	2021 no	2021 %	2022 no	2022 %	Variance no	Variance %
16–24	59	6.32%	50	5.27%	49	4.93%	36	3.47%	-23	-2.85%
25–29	65	6.97%	60	6.32%	73	7.35%	105	10.14%	40	3.17%
30–34	123	13.18%	109	11.49%	96	9.67%	95	9.17%	-28	-4.01%
35–39	131	14.04%	145	15.28%	146	14.70%	144	13.90%	13	-0.14%
40–44	129	13.83%	135	14.23%	146	14.70%	150	14.48%	21	0.65%
45–49	116	12.43%	105	11.06%	113	11.38%	124	11.97%	8	-0.46%
50–54	125	13.40%	141	14.86%	131	13.19%	126	12.16%	1	-1.24%
55–59	119	12.75%	117	12.33%	122	12.29%	122	11.78%	3	-0.98%
60–64	53	5.68%	72	7.59%	81	8.16%	102	9.85%	49	4.16%
65+	13	1.39%	15	1.58%	36	3.63%	32	3.09%	19	1.70%
Total	933	100.00%	949	100.00%	993	100.00%	1036	100.00%	103	11.04%

Table 1.1 shows the age profile of the organisation from 2019 to 2022

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)

Disability

Table 3.1: Disability

Disability	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %	Variance number	Variance %
No	417	44.69%	651	68.60%	683	68.78%	697	67.28%	280	22.59%
Not Specified	444	47.59%	152	16.02%	152	15.31%	184	17.76%	-260	-29.83%
Prefer not to say	21	2.25%	68	7.17%	76	7.65%	72	6.95%	51	4.70%
Yes	51	5.47%	78	8.22%	82	8.26%	83	8.01%	32	2.54%
Total	933	100.00%	949	100.00%	993	100.00%	1036	100.00%	103	0.00%

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)

Table 3.1 shows the composition of the disability self-reporting categories for the period from 2019 to 2022.

Of those staff who have declared a disability, females made up 58.54% (2021) and 53.01% (2022) of the population, and males 41.46% (2021) and 46.99% (2022). Due to the low number of staff declaring a disability within SQA we are unable to publish further intersectional data in relation to disability and other protected characteristics.

Race

Table 7.1: Race

Ethnicity	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
African, Scottish African or British African	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	<5	<0.48%
Asian, Scottish Asian or British Asian	13	1.39%	20	2.11%	24	2.42%	25	2.41%
Caribbean or Black	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Mixed or multiple ethnic group	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Not specified	383	41.05%	123	12.96%	101	10.17%	122	11.78%
Other ethnic group	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Prefer not to say	10	1.07%	33	3.48%	34	3.42%	30	2.90%
White	523	56.06%	763	80.40%	825	83.08%	849	81.95%

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)

Table 7.1 shows the ethnic minority background of staff within the organisation for the period from 2019 to 2022

Just under 3.50% staff declared they were from an ethnic minority background in both 2021 (3.32%) and 2022 (3.38%). However, it is encouraging to note that the percentage of staff declaring they are from an ethnic minority background has increased overall by 3.97% between 2019 and 2022. The percentage of staff within each ethnic minority category has remained relatively stable over the last three years.

Religion or Belief

Table 8.1: Religion or belief

Religion or belief	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
Another religion or body	< 5	< 0.54%	< 5	< 0.53%	6	0.60%	6	0.58%
Buddhist	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Church of Scotland	91	9.75%	122	12.86%	127	12.79%	125	12.07%
Hindu	< 5	< 0.54%	< 5	< 0.53%	7	0.70%	8	0.77%
Jewish	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Muslim	7	0.75%	11	1.16%	10	1.01%	11	1.06%
None	286	30.65%	421	44.36%	462	46.53%	489	47.20%
Not specified	405	43.41%	126	13.28%	102	10.27%	123	11.87%
Other Christian	26	2.79%	43	4.53%	44	4.43%	44	4.25%
Prefer not to say	35	3.75%	98	10.33%	103	10.37%	103	9.94%
Roman Catholic	76	8.15%	118	12.43%	129	12.99%	123	11.87%
Sikh	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%

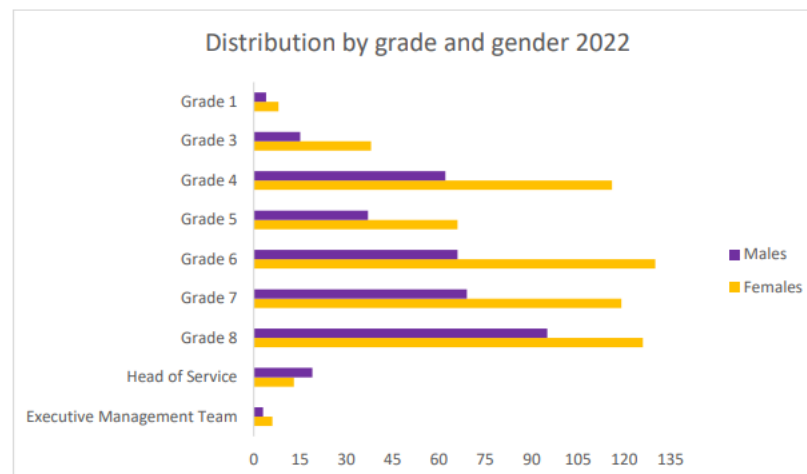
Table 8.1 shows the religion, belief or non-belief status of staff within the organisation for the period from 2019 to 2022.

Source: SQA Workforce Equality Monitoring Report 2021-23

Sex

Gender

Distribution by grade and gender of SQA grade 1 – EMT



Source: SQA Summary of Equal Pay Audit 2023

[Scottish Qualifications Authority \(sqa.org.uk\)](https://www.sqa.org.uk)

The majority of the 2.9 million lone-parent families in 2022 were headed by a lone mother (2.5 million, 84%)

Source: <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2022>

59% of unpaid carers are women (Census 2021). Women are more likely to become carers and to provide more hours of unpaid care than men. More women than men provide high intensity care at ages when they would expect to be in paid work (Petrillo and Bennett, 2022)

Source: Carers UK

There are 1.25 million sandwich carers in the UK. These are people caring for an older relative as well as bringing up a family. 68% (850,743) are women.

Source: <https://www.ageuk.org.uk/our-impact/campaigning/care-in-crisis/breaking-point-report/>

Sexual Orientation	Table 10.1: Sexual orientation								
	Sexual Orientation	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
	Bisexual	9	0.96%	12	1.26%	15	1.51%	16	1.54%
	Gay man	13	1.39%	20	2.11%	21	2.11%	23	2.22%
	Gay woman / lesbian	9	0.96%	10	1.05%	12	1.21%	12	1.16%
	Heterosexual / straight	431	46.20%	670	70.60%	700	70.49%	702	67.76%
	In another way	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
	Not specified	< 5	< 0.54%	< 5	< 0.53%	156	15.71%	189	18.24%
	Not sure	26	2.79%	76	8.01%	< 5	< 0.50%	< 5	< 0.48%
	Prefer not to say	443	47.48%	158	16.65%	84	8.46%	88	8.49%
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Table 10.1 shows the composition of staff sexual orientation within the organisation for the period 2019 to 2022.									
Source: SQA Workforce Equality Monitoring Report 2021-23									
Equalities: SQA workforce monitoring report 2021-23									
Gender Reassignment (Gender identity and transgender)	Due to the low number of staff reporting as transgender or describing their gender identity ‘in another way’, we are unable to publish further data in relation to gender reassignment or gender identity. This data is, however, monitored internally.								

Marriage/Civil Partnership

Table 5.1: Relationship status

Relationship status	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %
Civil Partnership	7	0.75%	7	0.74%	8	0.81%	9	0.87%
Co-habiting/in a relationship	80	8.57%	112	11.80%	122	12.29%	122	11.78%
Divorced/Dissolved Civil Partnership	14	1.50%	16	1.69%	17	1.71%	19	1.83%
Married	265	28.40%	370	38.99%	425	42.80%	416	40.15%
Married/Civil Partnership	8	0.86%	12	1.26%	14	1.41%	16	1.54%
Not Specified	407	43.62%	179	18.86%	102	10.27%	127	12.26%
Other	< 5	< 0.54%	< 5	< 0.53%	7	0.70%	9	0.87%
Prefer not to say	18	1.93%	49	5.16%	55	5.54%	59	5.69%
Separated	6	0.64%	12	1.26%	12	1.21%	13	1.25%
Single	122	13.08%	183	19.28%	224	22.56%	239	23.07%
Widowed/surviving partner from Civil Partnership	< 5	< 0.54%	6	0.63%	7	0.70%	7	0.68%

Table 5.1 shows the marriage and civil partnership status of staff within the organisation for the period from 2019 to 2022.

Source: SQA Workforce Equality Monitoring Report 2021-23

Equalities: [SQA workforce monitoring report 2021-23](#)

Pregnancy / Maternity

Table 6.1: Pregnancy and maternity

Pregnancy and maternity	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %
Contract ended as planned					1	3.33%		0.00%
Due to return to work					0	0.00%	11	40.00%
Resigned					0	0.00%	1	4.00%
Returned to work	20	100.00%	10	100.00%	29	96.67%	14	56.00%
Total	20	100.00%	10	100.00%	30	100.00%	26	100.00%

	<p>Table 6.1 details the number of staff who have taken maternity leave, whether they are still on maternity leave (due to return to work), have returned to work following maternity leave, resigned following maternity leave, or their fixed-term contract ended (contract ended as planned).</p> <p>Source: SQA Workforce Equality Monitoring Report 2021-23 Equalities: SQA workforce monitoring report 2021-23</p>
Care experience (where relevant)	SQA does not currently collect Care Experience data.

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
	Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people of different ages and therefore make no further recommendations in this area.
	<i>Advisory Comment: Younger employees who relocate may be less financially established than an older employee. They may therefore be renting property rather than be a homeowner so less able to avail all elements of the relocation package (e.g. solicitors fees, surveys etc).</i>
	<i>However, this policy exists to reimburse employees for actual expenses incurred. Typically, people in rented accommodation may not incur certain expenses and will not therefore require reimbursement.</i>
	Conclusion: Neutral equality related impact is therefore recorded in this area.
	Advance equality of opportunity
	All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the relocation policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their age.
Protected Characteristic	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people of different ages. No further recommendations in respect of this at this stage.
Protected Characteristic	General Equality Duty

Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on disabled employees and therefore make no further recommendations in this area.</p> <p><i>Advisory Comment: Disabled applicants can find it more difficult to relocate as there may be less availability of homes in the new area that meet their requirements. Increased costs may be incurred during the relocation process due to the additional adaption to a property they may need.</i></p> <p>We have added a comment for those whom the policy may cause an issue due to disability to speak to HR Shared Service or their line manager noting SQA will take any reasonable steps to support a new employee's needs when relocating.</p> <p>Conclusion: Neutral equality related impact is therefore recorded in this area.</p>
	Advance equality of opportunity
	All SQA employees are entitled to use, access, and of course, be subjected to the <i>Relocation</i> policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their disability.
	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people with disabilities. No further recommendations in respect of this at this stage.
Protected Characteristic	General Equality Duty
Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people of different ethnicity and therefore make no further recommendations in this area.</p> <p>Conclusion: Neutral equality related impact is therefore recorded in this area.</p>

	Advance equality of opportunity
	All SQA employees are entitled to use, access, and of course, be subjected to the <i>Relocation</i> policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their ethnicity.
	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people of different ethnicities. No further recommendations in respect of this at this stage.
Protected Characteristic	General Equality Duty
Religion or Belief	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people of different religions or beliefs and therefore make no further recommendations in this area.
	Conclusion: Neutral equality related impact is therefore recorded in this area.
	Advance equality of opportunity
	All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the relocation policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their religion or belief.
	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people of different religions or beliefs. No further recommendations in respect of this at this stage.
Protected Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people of different sexes and therefore make no further recommendations in this area.
	Conclusion: Neutral equality related impact is therefore recorded in this area.

	Advance equality of opportunity
	All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the relocation policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their sex.
	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people of different sexes. No further recommendations in respect of this at this stage.
Protected Characteristic	General Equality Duty
Sexual Orientation	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people of different sexual orientations and therefore make no further recommendations in this area.
	Conclusion: Neutral equality related impact is therefore recorded in this area.
	Advance equality of opportunity
	All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the <i>Relocation</i> policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their sexual orientation.
	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people of different sexual orientations. No further recommendations at this stage.
Protected Characteristic	General Equality Duty
Gender Reassignment (Gender identity and transgender)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people of different gender identities and therefore make no further recommendations in this area.
	Conclusion: Neutral equality related impact is therefore recorded in this area.
	Advance equality of opportunity

	<p>All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the relocation policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their gender identity.</p>
	<p>Foster good relations</p>
	<p>There is no additional evidence to indicate that this policy currently fosters good relations between people of different gender identities. No further recommendations at this stage.</p>
Protected Characteristic	General Equality Duty
Marriage/Civil Partnership	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people of different marital status and therefore make no further recommendations in this area.</p>
	<p>Conclusion: Neutral equality related impact is therefore recorded in this area.</p>
	<p>Advance equality of opportunity</p>
	<p>All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the relocation policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their marital status.</p>
	<p>Foster good relations</p>
	<p>There is no additional evidence to indicate that this policy currently fosters good relations between people of different marital status. No further recommendations at this stage.</p>
Protected Characteristic	General Equality Duty
Pregnancy / Maternity	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>Equality Risks: We conclude there is no evidence to suggest that this policy may impact directly on people who are pregnant or on maternity leave and therefore make no further recommendations in this area.</p>
	<p>Conclusion: Neutral equality related impact is therefore recorded in this area.</p>
	<p>Advance equality of opportunity</p>

	All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the relocation policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of pregnancy or maternity.
	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people who are pregnant or on maternity leave. No further recommendations at this stage.
Considered by SQA	General Equality Duty
Care experience (where relevant)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	We conclude there is no evidence to suggest that this policy may impact directly on people who are care experienced.
	Conclusion: Neutral equality related impact is therefore recorded in this area
	Advance equality of opportunity
	All newly appointed SQA employees who fulfil the required eligibility criteria are entitled to use, access, and of course, be subjected to the relocation policy and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of being care experienced.
	Foster good relations
	There is no additional evidence to indicate that this policy currently fosters good relations between people who are care experienced. No further recommendations at this stage.

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.
Not applicable.