

Equality Impact Assessment – Modernised HR policy framework

UKRI is committed to promoting equality and participation in all their activities, whether this is related to the work we do with our external stakeholders or whether this is related to our responsibilities as an employer. As public authorities we are also required to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations when making decisions and developing policies. To do this, it is necessary to understand the potential impacts of the range of internal and external activities on different groups of people.

What is an Equality Impact assessment (EIA) and why do we need to complete one?

An equality impact assessment (EIA) is an evidence-based approach designed to help organisations ensure that their policies, practices, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities.

The term ‘policy’, as used throughout this document, covers the range of functions, activities and decisions for which UKRI is responsible, including for example, strategic decision-making, arranging strategy & funding panels, conferences, training courses and employment policies.

The EIA will help to ensure that:

- we understand the potential effects of the policy by assessing the impacts on different groups both external and internal
- any adverse impacts are identified and actions identified to remove or mitigate them
- decisions are transparent and based on evidence with clear reasoning.

Ideally, an EIA should form part of any new policy, event or funding activity and be factored in as early as one would for other considerations such as risk, budget or health and safety.

What is discrimination?

Discrimination is where someone is treated less favourably or put at a disadvantage because of their protected characteristic. The different groups covered by the Equality Act are referred to as protected characteristics: disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race, religion or belief, sexual orientation, sex (gender), and age.

Discrimination is usually unintended and can often remain undetected until there is a complaint. Improving or promoting equality can take place when ways are identified to remove barriers and improve participation for people or groups with a protected characteristic.

Building the evidence, making a judgement

In cases of new policies or management decisions there may be little evidence of the potential effect on protected characteristic groups. In such cases a judgement is made

that is as reliable as possible. Consultation will strengthen these value judgements by building a consensus that can avoid obvious prejudices or assumptions.

Consultation

Consultation can add evidence to the assessment. Consultation is very important and key to demonstrating that organisations are meeting the equality duties, but it also needs to be proportionate and relevant. Considering the degree and range of consultation will safe-guard against 'groupthink' by involving a diverse range of consultees. These are the key considerations, to avoid over-consultation on a small policy or practice and under-consultation on a significant policy or an activity that has the potential to create barriers to participation.

Valuing Differences

EIAs are about making comparisons between groups of employees, service users or stakeholders to identify differences in their needs and/or requirements. If the difference is disproportionate, then the policy may have a detrimental impact on some and not others.

'You are looking for bias that can occur when there are significant differences (disproportionate difference) between groups of people in the way a policy or practice has impacted on them, asking the question "Why?" and investigating further'.¹

¹ http://www.acas.org.uk/media/pdf/s/n/Acas_managers_guide_to_equality_assessments.pdf

Equality Impact Assessment – Modernisation of UKRI Terms and Conditions

Question	Response
1. Name of policy being assessed	In Year Policy and guidance
2. Summary of aims and objectives of the policy	The project needs to have implemented a single approach to Instant and In Year awards for all UKRI employees (excluding those on contractual PRP) by the end of August 2020 as part of the wider Reward harmonisation strategy. The aim of this project is to introduce a harmonised approach to the execution of Instant and In Year Awards throughout UKRI, with the exception of those areas in receipt of contractual PRP (Innovate UK). A secondary aim of the project is to devolve responsibility for the ordering administration and reconciliation of Instant and In Year Awards to individual business areas. The purpose of the Instant Recognition Scheme and In Year Awards policy is to set out the principles governing the scheme. The benefits of harmonising the current schemes include: • By transitioning all members of staff within the Councils to a combined choice of either £100 cash or £70 Edenred vouchers this continues current arrangements for most and extends to those staff who are not currently eligible. • Moving to e-vouchers will facilitate receipt and spending in a Covid environment. • In year awards will be available to all and defined, consistent amounts and clearly defined criteria will help ensure more staff have access to awards There are two fundamental principles of this project 1) there is no detriment to employees in the new policy framework as awards are available to recognise the efforts of employees and 2) this is not policy development but policy modernisation and the scheme is separate to the Annual Performance Review Process (APDR).

	Note: End Year (or Above Standard Awards) awards are out of scope of this policy.
1. What involvement and consultation has been done in relation to this policy? (e.g. with relevant groups and stakeholders)	The policy and guidance have been developed in partnership with the Trade Union, in consultation with the UKRI HR Community and there has also been consultation with UKRI Senior Leadership Team.
2. Who is affected by the policy?	All UKRI all employees in Band H or below on permanent contracts and on temporary contracts over 12 weeks including staff on legacy T&Cs. This includes UKRI staff employed in NERC Centres. This policy does not apply to Visiting Scientists, Retained Consultants, contingent workers or agency workers with under 12 weeks service. Innovate employees with contractual PRP are excluded from these arrangements. This policy operates alongside the MRC SAS policy for staff on MRC terms.
3. What are the arrangements for monitoring and reviewing the actual impact of the policy?	The EIA activities are being undertaken to ensure that the assessment of the In Year policy remains objective. The policy was reviewed with a view towards understanding how the policy aligns with the broader UKRI values. What the EIA is seeking to do is assess the impact of the policy on certain protected groups. The absence of evidence or indicators against a policy does not necessarily mean that there is no impact on equality. As the policy is embedded into business as usual, further work should be done to obtain the relevant information to evidence whether or not the policy has a differential adverse impact or whether the policy requires a further impact assessment. Once the policy is in place, an assessment of its impact will be undertaken when circumstances dictate a change to employment law or there are changes other than changes to employment law which may necessitate a review. An assessment will also be undertaken as part of routine policy maintenance which will be scheduled over a 2 year cycle. The application of policy for employees who are within a protected characteristic group will be built into the review cycle.

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Protected Characteristic Group	Is there a potential for positive or negative impact?	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the policy)
Disability	Neutral	The policy is inclusive and does not disadvantage or advantage staff with disabilities, either visible or invisible. Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	UKRI collects annual employee statistics across four areas: Gender, Age, Disability, Ethnicity. The disability disclosure rate for employees is 33% which is significantly low. Addressing the negative impact of the policy is challenging unless UKRI is able to create a culture of disclosure. As there are no material changes to the application of the policy and an absence of baseline data, no new negative impacts can be identified. In moving to a single policy approach this should mean there is consistency in the application and experience for all staff. This coupled with the detailed guidance will ensure that all staff are aware of their responsibilities to apply the policy fairly, objectively and with equity and the consequences of not doing so will be made very clear. As part of the implementation plan, associated training will ensure that line managers have be aware of their responsibilities under the Equality Act 2010.

Gender reassignment	Neutral	The policy is inclusive and does not disadvantage or advantage staff who are undergoing, considering or recovering from gender reassignment. Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	
Marriage or civil partnership	Neutral	The policy is inclusive and does not disadvantage or advantage staff with and their marital status Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	

Pregnancy and maternity	Neutral	The policy is inclusive and does not disadvantage or advantage staff who are pregnant or on maternity, adoption or shared parental leave. Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	
Race	Neutral	The policy is inclusive and does not disadvantage or advantage staff on the basis of race. Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	
Religion or belief	Neutral	The policy is inclusive and does not disadvantage or advantage staff on the basis of religion or belief. Continued monitoring will allow the use of metrics to identify if the policy is having an	.

		adverse affect on any particular group.	
Sexual orientation	Neutral	The policy is inclusive and does not disadvantage or advantage staff on the grounds of sexual orientation. Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	
Sex (gender)	Neutral	The policy is inclusive and does not disadvantage or advantage staff on the basis of gender. Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	The gender data disclosure rate is 97%. It is therefore possible to use metrics to identify if the policies are having an adverse affect on one gender over another. The actual bonuses received between April 2019 and March 2020) complied as part of GPD 20 report ananalysis which is underway). Annex 2 displays data from above period.
Age	Neutral	The policy is inclusive and does not disadvantage or advantage staff on the basis of age. Continued monitoring will allow the use of metrics to identify if the policy is having an adverse affect on any particular group.	

Evaluation:

Question	Explanation / justification	
Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?	The following aspects need to be taken into consideration regarding equality, diversity and inclusion: 1. UKRI should ensure that as part of business as usual, it uses metrics to monitor whether the policies are having an adverse affect on any of the protected populations. Recognising that the experience of each populations are interdependent with other experiences, an intersectional approach (ie women and age) should be used for analysis and reporting. 2. UKRI should ensure that line managers have the capabilities to implement the policies consistently and fairly. UKRI HR will adopt an enabling approach to support line managers. 3. UKRI should ensure that where flexibility is routinely required, that the formal Ways of Working policy is used Steps taken to address these issues include: • Ensuring that the guidance is clear and all employees are clear on their roles and responsibilities • Line manager are supported in ensuring consistency of approach across the teams and are confident to have conversations and, are aware of the legal requirements of employees who have a protected characteristic.	
Final Decision:	Tick the relevant box	Include any explanation / justification required
1. No barriers identified, therefore activity will proceed .	x	
2. You can decide to stop the policy or practice at some point because the data shows bias towards one or more groups		
3. You can adapt or change the policy in a way which you think will eliminate the bias		
4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore you are going to proceed with caution with this policy or practice knowing that it		

may favour some people less than others, providing justification for this decision.		
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Will this EIA be published* Yes/Not required (*EIA's should be published alongside relevant funding activities e.g. calls and events:	Not required but available if requested
Date completed:	31 July 2020
Review date (if applicable):	31 July 2021

Change log

Name	Date	Version	Change
	When published	1	

Annex 1: Previous Years Average In Year Award & Awards in 2019

Average In Year Awards (2018 & 2019)

2018/19 Remit Year

Row Labels	Average
AHRC	£391
BBSRC	£617
EPSRC	£784
ESRC	£707
MRC	£533
NERC	£550
RE	£1,000
STFC	£293
UKRI	£586
Grand Total	£490

2019/20 Remit Year

Row Labels	Average
AHRC	£387
BBSRC	£455
EPSRC	£716
ESRC	£710
MRC	£579
NERC	£539
RE	£652
STFC	£303
UKRI	£523
Grand Total	£474



Number of staff who received In Year Award 2019

	Amounts Awarded								Grand Total
	£100	£101-200	£201-300	£301-400	£401-500	£501-750	£751-1000	£1000 +	
Council	Numbers of staff who received Award								
AHRC			19	2	15	1	1		38
BBSRC			2	3	1	2	1		9
EPSRC		2	12	2	32	26	25	9	108
ESRC			13		10	10	9	8	50
UK			1		2	2	3	15	47
MRC	1	2	14	10	47	1	11	3	89
NERC		6	144		99	29	1	15	294
RE	2		8	1	13	5	10	4	43
STFC		2	431	21	11	10	2	1	478
UKRI		5	76	2	85	16	26	9	219
Grand Total	3	17	720	41	315	102	89	64	1375

Above figures equate to 19% of total UKRI staff in receipt of In Year Awards



Annex 2: Bonus Gender Pay Gap (April 2019-March 2020)

Instant and In Year Awards

Type of Award	No of Men	% of All Men	Avg Award
Instant	366	10%	£66
In Year	582	15%	£544
Total	876	23%	£344

Type of Award	No of Women	% of All Women	Avg Award
Instant	558	18%	£79
In Year	538	17%	£596
Total	963	31%	£312

- Actual bonuses received between April 2019 to March 2020 (compiled as part of the GPG 20 Report analysis that is underway)
- Women are nearly twice as likely as men to receive an instant award.
- Women have received higher average value Instant and In Year awards.