



Social Security Scotland  
Tèarainteachd Shòisealta Alba

# Social Security Scotland Equality Impact Assessment Record Our Ways of Work Project

Dignity,  
fairness,  
respect.

# Description of Activity

## Our Ways of Work project

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Due to the COVID-19 pandemic, from March 2020 the majority of Social Security Scotland colleagues moved to home working with a small exceptions of colleagues who needed to continue work in our buildings this included mailroom, service desk and accommodation colleagues.

The Our Ways of Work project was established to explore options and produce suggested solutions and will run between July 2021 and August 2022. It is a people solution led project that will engage with colleagues, clients and the business to understand what they want, what is needed and to balance that with how we meet expectations and deliver best value.

As well as taking input from our colleagues, clients and the business. The project team gathered insight from other business areas and other organisations. Available data was analysed to provide indications about impact of proposed actions on service delivery, cost or colleagues wellbeing. There was also work to ensure the needs of clients and the business requirements are captured and evaluated.

Although the project will conclude in September 2022, this does not necessarily mean that everything required to support hybrid working will be in place. However, a vision for our ways of working will have been agreed and activities to deliver upon this will have commenced and be built into future business planning and evaluation of hybrid working success.

## 1. Screening

### What is the aim of the proposed activity?

This aim of this project is to deliver a great place to work for all colleagues in which we understand our clients' and stakeholders' need and want. In addition to embedding a culture in which we look out for each other and our own wellbeing.

The project identified how we can work in a flexible hybrid way, while meeting objectives and continuing to deliver a great service, minimising the impact on the environment and delivering best value.

The objectives we have set for this project are to establish a ways of working that will:

- Ensure that Social Security Scotland is a great place to work which is inclusive attracting people to apply and help us develop a diverse workforce
- Provide Social Security Scotland the space to be creative and productive while giving the taxpayer value for money.
- Help us build relationships with local communities by being visible
- Ensure proposed ways of working are designed and tested with our clients and colleagues so that it will meet all needs
- Continue to communicate, be transparent and engage throughout the whole project lifecycle ensuring colleagues feel involved and know what to expect.

The Equality Impact Assessment is an essential contribution to process of delivering recommendations to the Social Security Scotland Executive Board. In addition the Social Security Scotland 'Our Charter' set out many commitments for the services we deliver including:

- Recruiting people who care about delivering a service based on equality, respect, dignity and human rights.
- Involve people with diverse lived experiences of social security and the organisations that represent them in training staff.

The Equality Impact Assessment has provided evidence and supported the evaluation process. Consideration and understanding of the diverse needs of our colleagues by highlighting the benefits and barriers for working in a hybrid workplace. The aim for this paper is not resolve the barriers identified but to highlight the data/research/input we received during the project and identify the action owners to who will be responsible to ensure that future work is done to mitigate against or remove them.

The quantitative data findings from the colleague's engagement activities including survey results and engagement sessions will also be included in the assessment.

## **Who will it affect?**

Hybrid working will impact all Social Security Scotland colleagues and have an impact on people with protected characteristics as defined in the Equality Act (2010).

The project team have engaged with a wide range of stakeholders to understand the needs and perspectives of colleagues, along with our internal and external networks to take into account their perspectives.

The project trialled different hybrid working models with colleagues working in Social Security Scotland to understand what works and what does not. These arrangements must strike a balance between what works for colleagues, what fits for

the organisation and is best for our clients. We need to do this while ensuring we deliver best value for the public purse and making sure that every penny counts.

## **What might affect the success of the proposed activity?**

As an organisation we've continued to grow and evolve how we work around national COVID lockdowns and adhering to restrictions that has limited access to our estates except for relatively small number of our people with the majority of colleagues working from home for a 2-year period. As a business, we have decided that we want to find a way to blend the benefits of home working and office working. As a result, we have committed that the organisation will adopt a hybrid working approach in the future.

This project is a considerable risk but high reward project which has been delivered at pace. As such, it is mandatory and essential, as an organisation who has inclusivity and equality at the heart of its culture, that we consider the impact the moving to a hybrid workplace has on our organisation.

The project is reliant on many dependencies along with departments engaging and supporting the project. This includes:

- Ensuring our technology and IT capabilities are fit for purpose in supporting the various working models of hybrid working
- The Learning and Development team creating and delivering a training package which is aligned with Social Security Scotland guidance to staff around hybrid working to enable staff understand and utilise trying different hybrid working models
- People Advice and Support providing clear guidance and support packages, that has been reviewed and aligned with Scottish Government's HR policies ensuring support for staff and managers specifically around change management, resilience, and challenging conversations.
- Appropriate guidance and process from Health & Safety (aligned with legislations) to support work in a hybrid work environment, this would include desk assessment, Personal Emergency Evacuation Plans, trained fire marshal's, a process for ordering and storage of additional equipment.
- Dependency on the Analysis & Insights team developing and analysing a client survey to enable information gathering on how clients view a hybrid working model to allow the project to make evidence-based decisions on ways of working, which is to be repeated once hybrid working has been embedded to ensure maximum output of service deliverables.
- Clear communication being issued to job applicants and new starts on what the new working models might be, to enable expectations of fresh staff members being aligned with project outputs. This includes awareness of Volume

Recruitment project which are collating on-boarding requirements for new starts to ensure staff are equipped and resourced to deliver the service required.

- Dependency on the Data Protection team to provide data protection and security requirements and assess potential models of hybrid working against those requirements.
- Developing and maintaining an inclusive culture for all who work in or join Social Security Scotland. With strong support from Senior Leadership team and the promotion of campaigns which are at the heart of our values, for example 'intelligent kindness', our 'people and wellbeing partners' and 'what matters to you?' Day.
- Being Mindful of the cost-of-living crisis which will impact the whole of the United Kingdom with the rise in fuel prices and utility bills. The crisis will have a disproportional impact on those with protected characteristics. The Scottish Government has responded with a programme which includes the rollout of Scottish Child Payment to those 16 under. The impact of delivering this payment is divisions working together in a cost and time effective way.

Through engagement with external stakeholders, we know that if the project tries to adopt a one size fits all approach, it just will not work. Hybrid working can be approached in different ways dependant on business needs and personal circumstances.

This decision aligns with what we have been told us in previous pulse surveys, engagement sessions, business insights interviews and client surveys. Whilst we have had success working virtually, re-establishing a regular connection between our people and our office locations will strengthen our culture, our shared sense of identity. Increased face to face workplace interaction supports our commitment to kindness and helps our collective wellbeing.

There are also some real practical benefits to working from an office, including information technology resilience, enhanced data security and collaboration. We are mindful that our commitment to establishing office locations in Dundee and Glasgow has helped promote meaningful re-generation and created new jobs in each city. In addition to our local delivery roles around Scotland's 32 Local authorities.

## 2. Exploratory Work Results

Each of the protected characteristic were reviewed against a rich source of evidence and robust data on protected characteristics which were all considered as part of this Equality Impact Assessment and has been included in the data gathering section. This formed the baseline for workshops and engagement sessions with both internal colleagues and external stakeholders to identify the type of feedback needed. For example colleagues were asked to go into breakout rooms to give feedback. The breakout rooms covered Facilities, Wellbeing, Making commuting worthwhile and Office environment

1045 colleagues attended 1 of the 17 roadshows held by the project and 200 colleagues attended workshops to give their feedback on hybrid working. With additional support from the Trade Unions, separate workshops were held with colleagues with protected characteristics.

Results from the engagement sessions and workshops included:

- Colleagues were engaging with the hybrid working trials and on the whole had enjoyed their experience of hybrid working;
- There was increase in colleagues attending offices (many for the first time) had thrown up some 'teething' problems, around issues such as storage, noise, and facilities;
- The cost of commuting had become a bigger issue for more people. Partly as a result, colleagues were keen to ensure that days in the office were purposeful and productive;
- Colleagues were beginning to develop their personal and team approach to hybrid working and how it could best support them in their different roles.
- Intersectionality plays a significant part in the lived experience of people protected characteristic groupings.
- Disabled colleagues raised particular issues, which we are continuing to address;
- Disability, as a protected characteristic, has extra complexity due to the range of different experiences of those living with the same/different disabilities. The aim is to create a variety of workspaces and hybrid working arrangements to cater for a range of needs.
- Workplace adjustment passports are up to date.
- Buildings/offices present the opportunity to offer a fair platform for socio-economic aspects. Consideration has been placed around city centre locations, proximity to transport links and ease of access.
- Having a range of different spaces which work in a variety of ways is likely to make the provision of reasonable adjustment straightforward and ensuring managers have regular wellbeing conversations with their colleagues to ensure:
- Individual needs and provisions are in place both in the home and office working environments.
- Provision of private, lockable space within a reasonable proximity of where the person is working should be accessible to several protected characteristic groupings when they are needed.
- In our estates, men and women are afforded access to toilets and changing facilities on the same basis and with privacy.
- Gender-neutral toilets and changing facilities should be provided on the same basis and with privacy.
- Clear communication is essential in addition to clear expectations of what hybrid working means and how it fits into the culture embedded into Social Security Scotland, specifically for the Executive Leadership Team.
- Clear guidance and support packages should be given to managers for supporting their team with the move to business as usual and hybrid working being the norm.

Although, caring responsibilities are considered to be a protected characteristics, most colleagues had a view on how different types of hybrid working may impact this, with colleagues with caring or childcare responsibilities more comfortable with the fixed hybrid working to allow them to plan their working week around their responsibilities.

It is worth mentioning that throughout the sessions the consensus from colleagues was that we have excellent policies, procedures, values and support in place for our people. As a flexible working employer, hybrid working was seen by most colleagues as another benefit of working for Social Security Scotland and further strengthens our flexible working approach.

In addition it is worth noting that an impact identified as a positive experience for one colleague with a protected characteristic will not necessary be positive for all colleagues in the same protected characteristic group. The same can be said for negative. In addition it cannot be assumed that an impact identified as positive will be positive for all, it may be the opposite and likewise for negative feedback. Bearing this in mind choice and proportionality are key to embedding equalities within the projects.

### **3. Data and evidence gathered**

The purpose of undertaking this is to satisfy the three needs of the equality duty:

- To eliminate discrimination
- Advance equality of opportunity
- Foster good relations

Each of the protected characteristics were reviewed against a rich source of evidence gathered. A Framing Workshop, with subject matter experts and colleagues with lived experience, identified potential impacts and barriers. Where it was evident there were potential negative impacts, the risks (in line with the Equality Impact Assessment\_Risk Assessment Framework) were reviewed. Mitigations were taken into account for either remove potential barriers or lessen the impact, against the context of proportionality.

In addition to the Roadshows and Engagement sessions held by the extended project team, several other pieces of research was conducted by the Dependency on the Analysis & Insights team with their results included in this Equality Impact Assessment. This included:

- Pulse Survey  
Survey open between July and early August 2021 and aimed at being an initial check in to see how colleagues were feeling at a time restrictions around COVID-19 were starting to be reduced and asked for their views on how they visualised the future ways of working. In total, approximately 1115 colleagues responded to this survey.

- Colleague Focus Group/Team requirement sessions  
Held November and December 2021 to allow colleagues to express their views on how work has been since the start of the pandemic and how colleagues can shape the future ways of working and the Our Ways of Working project. Over 50 sessions with 15 spaces available at each session.
- Hybrid working Roadshows  
Held in the Spring of 2022 these engagement sessions aimed to engage with all colleagues to raise awareness and answer any questions relating to hybrid working. These sessions were also for the project to understand team requirements, discuss emerging themes and seek further feedback on various hybrid working models. In total 17 sessions were ran with attendance of 1,045 colleagues. We received nearly 300 questions, on subjects such as travel, accommodation and health and safety.
- 'Looking Ahead' Survey  
Conducted from 22 March – 12 April 2022 which looked to measure colleague expectations of hybrid working (staff sample 2,375. Accurate on eHR as of 1 March 2022)
- 'Experience' Survey  
Conducted from 27 June – 27 July 2022 which looked to measure colleague expectations of hybrid working (staff sample 3,080. Accurate on eHR as of 1 June 2022)
- Diaries  
Conducted from 8 April – 1 July 2022 which was done to understand colleague experiences throughout the trials, identify changes over time. This was an opt-in 'Looking ahead' Survey
- Observations  
Conducted from 12 April – 29 June to increase researcher understanding of hybrid working, identify themes and topics of interest for further research. This research was done by observation
- Focus Groups  
Conducted from 12 July to 22 July to probed survey results to gain more depth to individual experiences of hybrid working. This was using colleagues who opted in from the 'Look Ahead' survey and included a sample from division and grade
- Joint Panels research: Working location of staff  
The Experience Panel was established in 2017 and The Client Panel was established in 2020 with membership being made up for clients having experience of claiming a benefit delivered by Department for Works and Pensions.
  - The research gathered by the Experience Panel Research feeds in to the design of the social security system including service delivery and benefit design



- The research gathered by the Client Panels is used for continuous improvement and the Charter Measurement Framework

The Working Location of Staff survey was conducted to understand the views of current or potential clients about interacting with staff working in different location. A total of 535 panel members completed the survey representing a response rate of 10%.

- Our Ways of Working Engagement Sessions

Held in June 2022 these engagement session were attended by approximately 200 colleagues to get colleagues feedback of their experiences during the hybrid working trial specifically covering the following themes:

- Facilities - equipment and facilities within the office.
- Wellbeing - caring responsibilities / work life balance / mental & physical health / autonomy (and lack of) Work place adjustments.
- Office environment - noise levels/distractions, office etiquette privacy and layout.
- Making commuting worthwhile - making the most of office days.

Additional sessions were held in August 2022 in partnership with the Trade Union to gain insight into how colleagues with disabilities have engaged or felt engaged with the trials, along with feedback about their own experiences of hybrid working

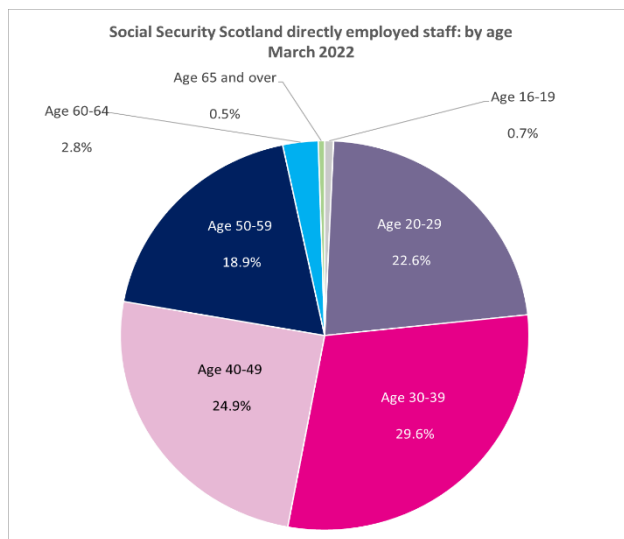
## Protected Characteristics Definitions

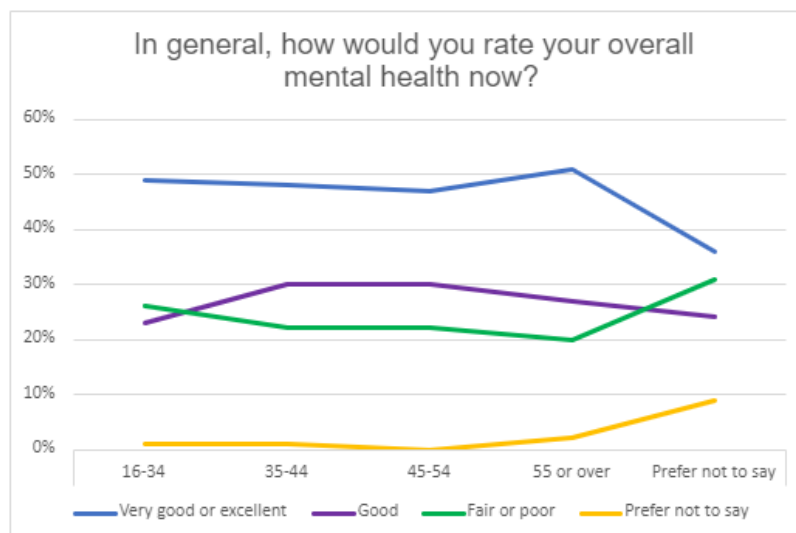
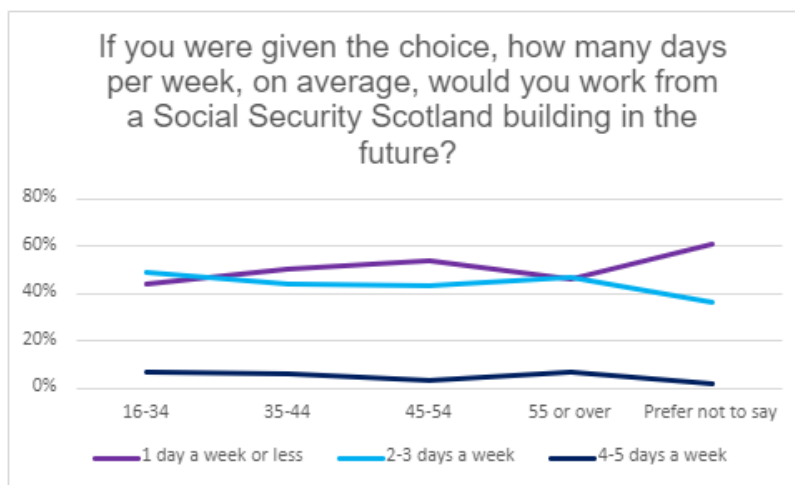
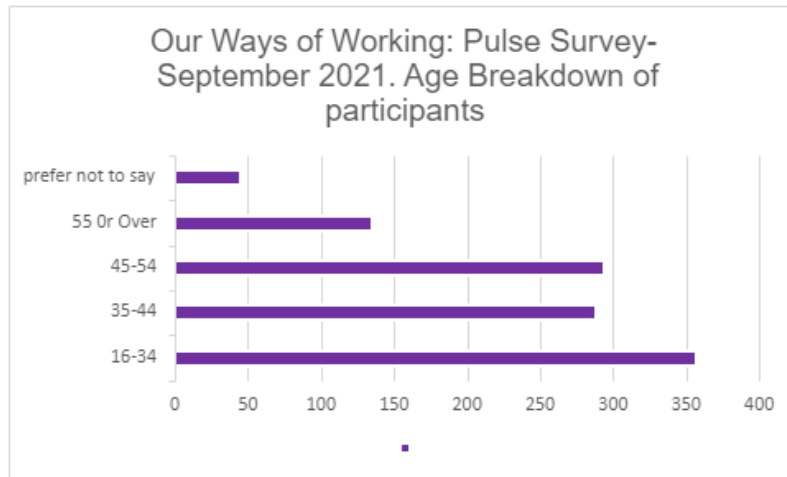
Unless stated the following definition for protected characteristics is from [Protected characteristics | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/protected-characteristics)

The majority of the data used in this section was taken from our pulse surveys.

### Age

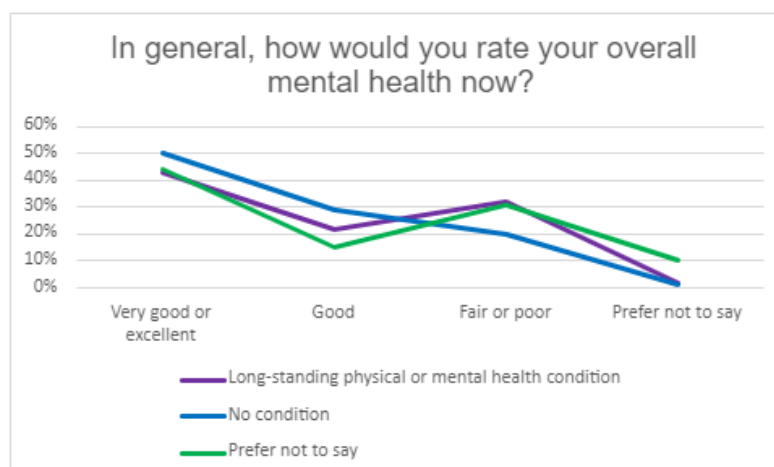
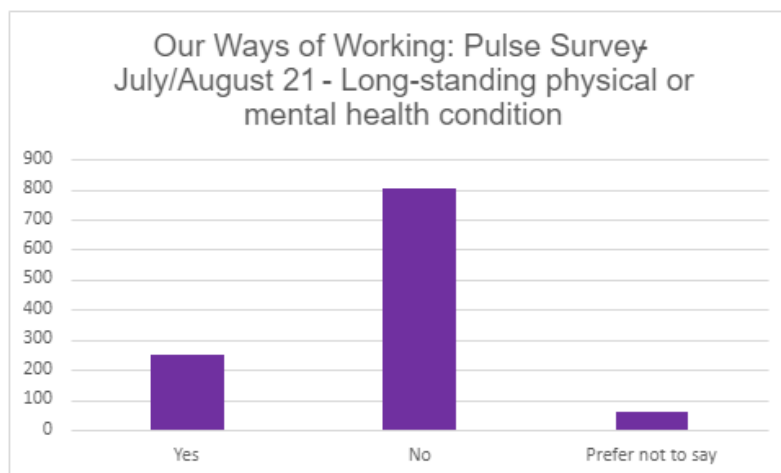
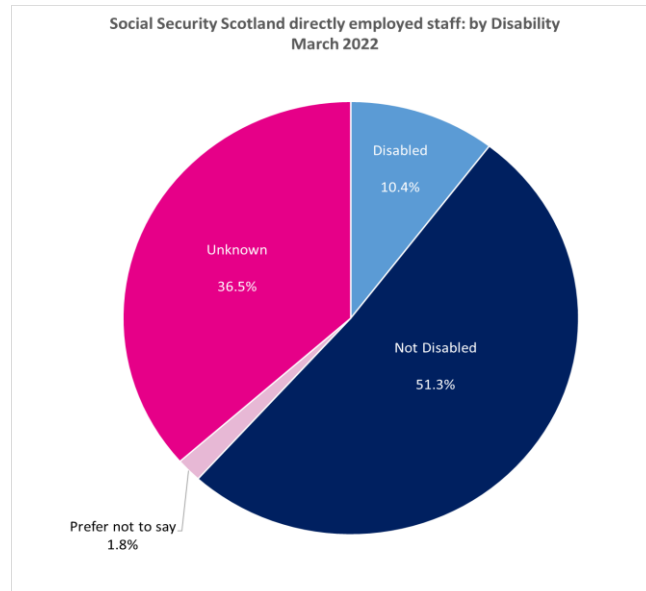
A person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds)

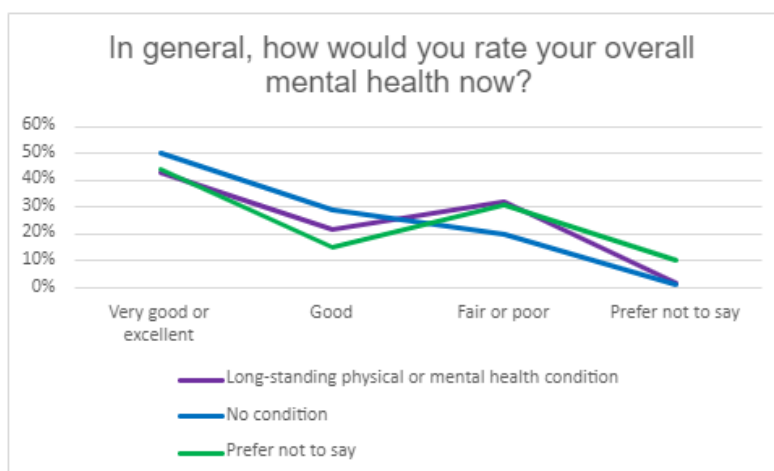




## Disability

A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.





## Gender reassignment

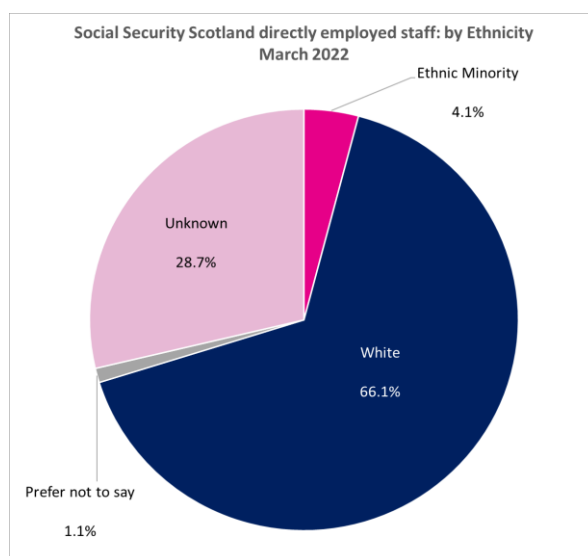
The process of transitioning from one sex to another.

## Pregnancy & maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

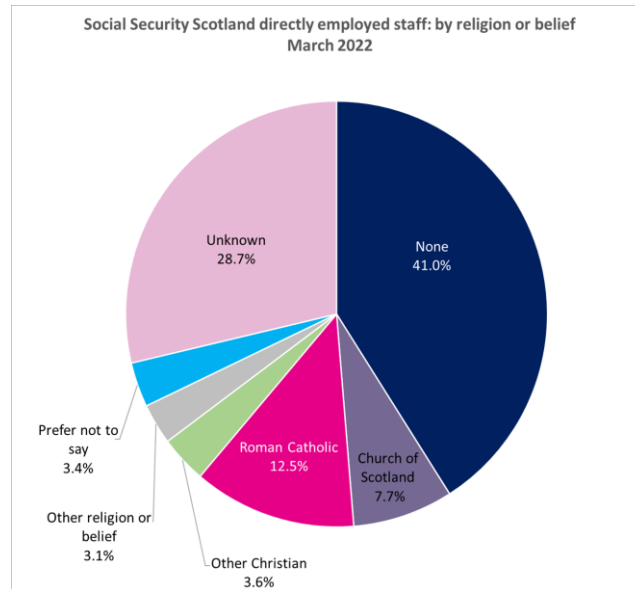
## Race

Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.



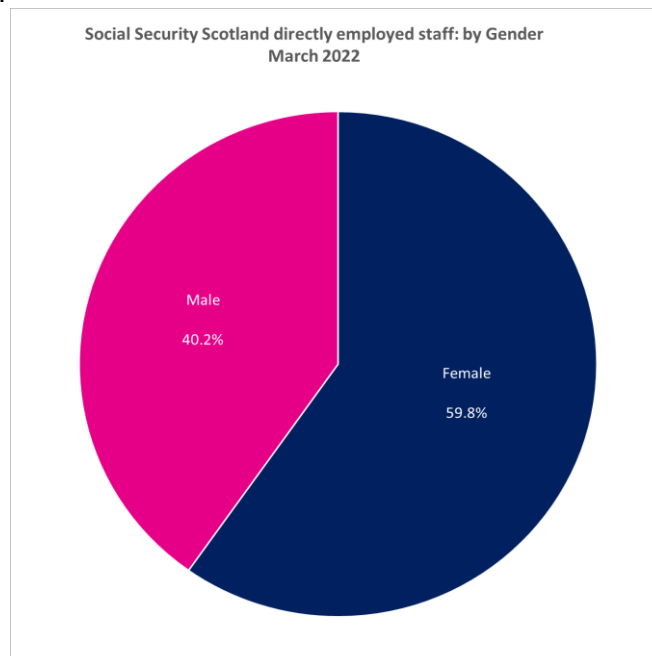
## Religion or belief

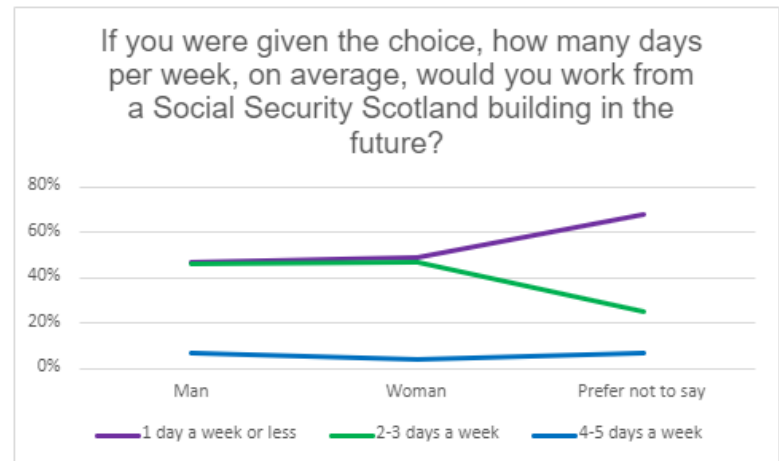
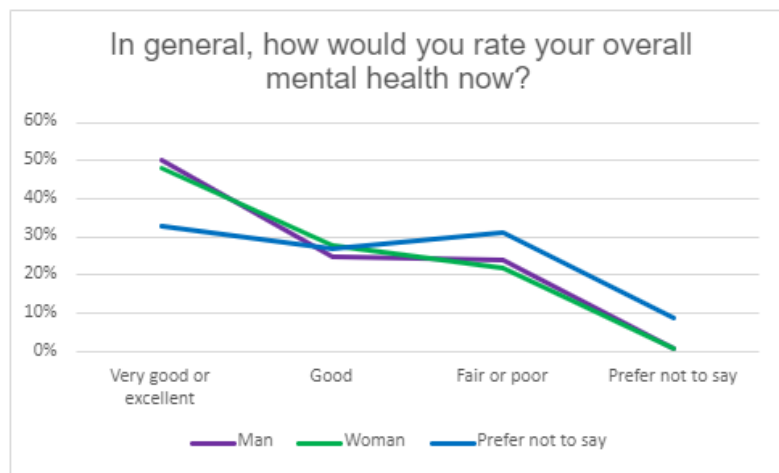
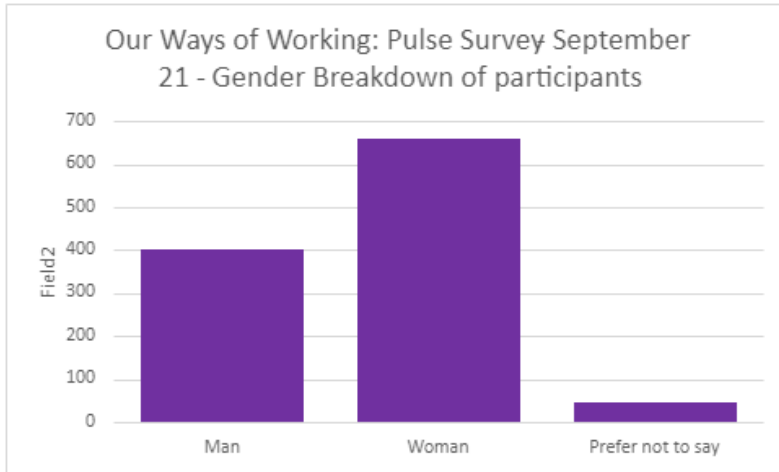
Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.



## Sex

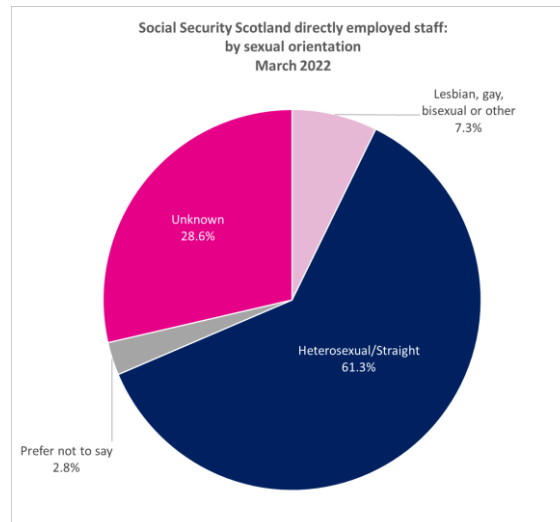
A man or a woman





## Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

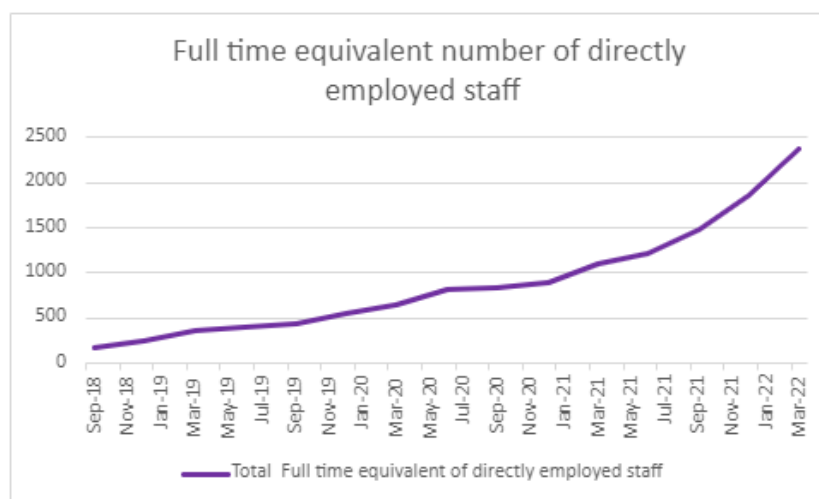


## Care Experience

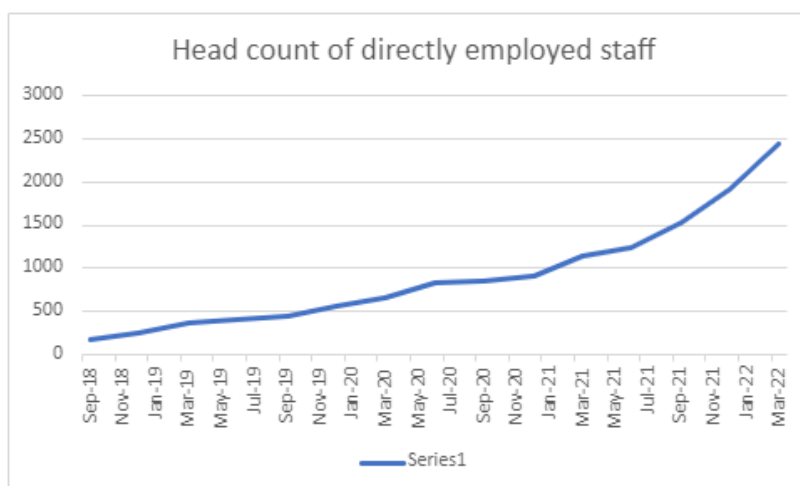
Is anyone who currently is or who has ever been 'looked after'. This is an inclusive term and includes those who are currently looked after, those who have been looked after at some point in their lives, and care leavers, be it looked after at home or away from home in kinship care, residential, foster or secure care.

[corporate-parenting-plan-2019-2021.pdf \(socialsecurity.gov.scot\)](#)

## Additional Evidence Used



[Full time equivalent number of directly employed staff](#)



## 4. Assessing the impacts and identifying opportunities to promote equality

Following on from the exploratory workshop, taking into consideration all the data and evidence gathered from various workshops, roadshows and survey's conducted, the impact on each of the protected characteristics was identified. Actions to reduce any negative impacts and maximise positive impacts, and the impact of proposed activity were measured against the three needs of the Public Sector Equality Duty:

- Eliminating unlawful discrimination, harassment and victimisation;
- Advancing equality of opportunity;
- Promoting good relations among and between different groups.

### Age

#### Potential Positive Impacts

Younger employees less likely to have caring responsibilities, more flexibility in different times, days, and locations they can travel.

More flexible workspaces (technology enabled) attracts/retains younger workforce.

Being able to work in a variety of locations and closer to home helps colleagues manage responsibilities for older parents (community spaces/keeping it local).

Movement in the workplace e.g., different work settings for different work activities; minimises health issues and helps wellbeing.

Promotion of age inclusiveness.

Flexible working could be beneficial for those with health conditions that traditionally come with age. Managing symptoms discreetly without drawing attention from peers.



It could also mean people with health conditions that would benefit from additional manager and wellbeing support could go unnoticed.

Hybrid working could benefit women who are going through menopause and help with symptom management.

### **Potential Negative Impacts/ Potential Barriers**

Some people who are older may require certainty of location and proximity to other facilities, related to other influences/characteristics such as health (e.g., menopause, dementia)

Four generations in the workplace – do different groups needs/requirements/ ways of working conflict – one environment cannot suit all.

Older people are more likely to have caring responsibilities so may prefer to work from home, may get less opportunities than younger people who may be more 'present' in the office.

Younger people are more likely to have childcare responsibilities and therefore may also have less opportunities in some instances.

Younger people may have a stronger grasp on the technology available (e.g. collaboration tools and hybrid meeting options) and older people not having the same positive experience of hybrid working as a result.

### **Action**

Clear communication, guidance and support for all Social Security Scotland colleagues with regards to expectations around Hybrid Working. For example, how many days colleague will be in the office, wellbeing support if required, guidance for days working from home.

Strong organisation culture which is supported by senior management team.

Advanced warning with regards updates with regards of any changes which can impact on when a colleague is required to be in the office.

A clear recruitment policy which attracts people with lived experience, which is inclusive and is fair.

Strong role models throughout the workplace who are happy to talk about their experiences.

### **Public Sector Equality assessment**

These actions would support the three needs of the Public Sector Equality Duty by:

- Eliminating unlawful discrimination, harassment and victimisation by ensuring an awareness of the impact of age for colleagues working in a hybrid work environment.
- Advancing equality of opportunity for all Social Security Scotland colleagues could benefit people of all ages as flexible hybrid working model have proven to promote a healthier work/life balance.
- Promoting good relations together with the Social Security Scotland Human Resources People Policy and tools such as the employee passport could benefit colleagues, who for example are experiencing the menopause, along with creating a positive and inclusive culture for the organisation.

## **Disability**

### **Potential Positive Impacts**

Working from home on a regular basis positively impacts some people while the flexibility of working in an office provides balance and means some people can still be in an office too.

Working from home and Hybrid set up can positively impact some people who are unable to work in an office full time and could be a driver for recruitment.

Working in a hybrid way could help with management of health conditions and appointments etc.

Hybrid working reduces the risk of contracting COVID-19 (as opposed to full time office working)

Our building provides;

- 'Changing Place' toilet facilities (colleagues & visitors) in our buildings
- Signage and Wayfinding helps ease movement and flow to, through and from buildings/spaces (language, colours, images)
- Office spaces are designed to accommodate people with sensory overload, visual impairment, hearing impairment, restricted mobility.
- Balance social busy spaces with quiet calm spaces, know where to find them and protocols in place to ensure colleagues respect users of these spaces
- Options for smaller tables / solo spaces to eat lunch away from noisy canteen spaces
- Technology improvements e.g. hearing loop systems

- Technology which can be duplicated in both the home and estates e.g. JAWS for accessibility
- Opportunity for all facilities on ground floors of buildings to be fully accessible, useable, and connected e.g., meetings, refreshments, toilets which allows independent use and flow
- Appropriate language, use the social model of disability, in communications and signage
- Technology enabled functions e.g. app usage, meeting room bookings (tablets at meeting rooms – appropriate height), swipe pass entry and exit, visitors
- Time out spaces e.g. contemplation/prayer rooms
- Medication requirements - ease of access to appropriate spaces and easy use for taking medications and/or injections – privacy and dignity
- Consistency of access pads (left/right sided, height, space from door)
- Consistent look and feel of refurbished spaces (smarter workplaces) in all buildings so familiar and expected regardless of which building working from.
- Turn up and use range of spaces, furniture (not have to move chairs out of the way, ask someone to move) for wheelchair users and options to transfer from wheelchair to other seating (left and right sided)
- Ease of transition from different spaces, facilities using all senses e.g. touch (flooring textures, hazards, wayfinding), vision (colours, lighting, graphics, wayfinding), hearing (sound, acoustics, loop systems, quiet spaces), smell (stimulation, focus, axillary spaces, wayfinding)
- Accessible and useable facilities (different heights) e.g. adjustable height furniture, water supply, fridges, sinks, microwaves, toilets, shower/changing, lockers
- Flexible spaces offering choice of seating
- Configuration of meeting/conference rooms – flow, height of furniture, positioning of technology (e.g. smart conferencing) – reach, braille, British Sign Language, captions/subtitles
- Proximity of parking to building entrances
- Proximity and ease of access from public transport to building entrances

## Potential Negative Impacts/Potential Barriers

Space available for collaborative working varies significantly across the estate, how can equity be achieved.

Commuting costs may be prohibitive in some instances – how will this be managed, communicated.

Potential conflict for diverse needs/requirements for separate groups.

Location of some buildings / route to work – are some groups more vulnerable/subject to abuse or threat (safety and security).

People could struggle with the change to hybrid and the uncertain routine until it becomes established. In addition, late notice of change of day coming into the office or seeing different people during office days.

Our colleagues are at greater risk of contracting COVID-19 and other conditions by both travelling and going into an office as opposed to solely working from home.

Consideration for those that have various disabilities making sure adjustments are implemented to support people while travelling to work and whilst working.

Ease of access to buildings and spaces independently (without need for assistance). In addition doors around the building are different. For example some doors are automatic, others you need to press a button and other can be difficult to open if they only open in one direction.

Back-to-back or frequent digital meetings can be challenging especially if people in the meeting do not understand virtual meetings and accessibility.

Examples provided were:

- Unable to lift heavy equipment
- Distance between parking the car and the office/accommodation for those who have mobility difficulties
- Accessibility to various buildings, clients' homes etc.
- Adapted equipment at home, if travelling between locations need to make sure right equipment and adjustments are in place at the right place at the right time
- Personal Emergency Evacuation Plan to be in all locations that are applicable with colleagues appropriately trained and in the office at the same time as the Plan holder.

Feedback from the engagement sessions held with disabled colleagues highlighted the need for a desk booking tool. This would be to specialist desks or a desk in an area of their choosing the colleague. For example high rise desks or desks which are

in a dedicated quiet zone. Colleagues who have challenges with travelling or find it difficult to adjust to change want the reassurance and security of knowing they have a desk, where they will be sitting in the office and also who they will be sitting beside.

## Action

As an employer who champions diversity, we have seen an increase in colleagues who are neurodiverse. There are many benefits along with many challenges with working in a hybrid workplace. Many neurodiverse colleagues' need routine and a manager who has full awareness on how to access support. There are clear policies already in place to support colleagues with disabilities, there was a perception that it need to be more visible and accessible/

- Having a hybrid working model which allows set days in the office in which you are aware members of team will be in.
- A clear structure to their day and know what work is to be done
- Flexibility to manage Neurodiverse condition e.g. extended breaks or lunchtime if tired and need time to rest. Or near to meltdown
- Flexibility and autonomy to organise working day along with work/life balance.
- Getting use to an office with a large amount of people (especially after being able to control own environment)
- Over/under stimulation in office environment e.g. too much noise, lighting in office, windows which are full length
- Temperature of building
- Designated or specific toilet facilities (sensitive to smell)
- After a period of constant TEAMS/Virtual meeting, in person meeting can be challenging as body language and eye contact are an more essential part of communication.
- A desk booking tool which supports staff with additional requirement and accessibility needs

In addition to the above these were identified for mobile workers:

- Individual has an adapted car however requires a works car, however not adapted.
- make-up of being a mobile worker could be disproportionately low by people with a disability as recruitment vacancy stated must be able to drive.
- Sensory such as smoking, animals etc., this can have a negative impact on mental health when attending locations where this is unknown.

- Some people might find moving between locations stressful
- Some people prefer set routines and would find hybrid working/changes days in the office stressful.

## **Public Sector Equality assessment**

These actions would support the three needs of the Public Sector Equality Duty by:

- Eliminating unlawful discrimination, harassment and victimisation by offering different and flexible hybrid working models which would support a healthier work/life balance.
- Advancing equality of opportunity could benefit our disabled colleagues by offering a flexible hybrid model. Social Security Scotland is inclusive employer with excellent policies and procedures, and a workplace adjustment passport in place to support colleagues.
- Promoting good relations among and between different groups by taking advantage of inclusive technology which promotes inclusivity.

## **Gender Reassignment**

### **Positive Impact:**

For those who are undergoing a medical transition and need to take hormones and then come off them regular procedures working in a hybrid workplace can support them during this time by adjusting frequency in the office. In addition we have a secure room which is used for storage of medication which may need to be refrigerated, for example hormones for transitioning.

Changing spaces, toilet facilities – privacy, dignity

Changing spaces – enclosed / coverable cubicles not open space

Safe spaces (physically and emotional)

Signage and wayfinding language can be inclusive.

Monthly wellbeing meetings with manager and employee passport.

### **Negative Impact:**

Layout of toilet facilities (e.g. shared handwashing)

Some barriers to using wider facilities other groups benefit from e.g. fitness, wellbeing due to lack of privacy, dignity

Location of some buildings/route to work – are some groups more vulnerable/subject to abuse or threat (safety and security)

Virtually, we can easily demonstrate our pronouns and preferred names but when we return to the office we will not be as prevalent.

Mobile workers

Concern raised possibly over safety due to clients understanding or standards of behaviour, how do we make sure clients treat our people with dignity and respect.

Risk of discrimination and harassment towards transgender people from clients

## **Action**

Our buildings have been designed to be accessible to all with clear signage and plenty of staff spaces. It is essential that managers continue with regular wellbeing conversations to allow for a trusting professional relationship promoted by our culture alongside updating of employee passports so it is clear the support that is required by any colleagues as well as note of pronoun preferences.

In addition our guidance needs to be clear to our clients that we have ‘no tolerance for bullying or harassment’ for our staff along with clear guideline for colleagues to report clients who have harassed a colleague ensure they are not in a position to do so again.

## **Public Sector Equality assessment**

These actions would support the three needs of the Public Sector Equality Duty by:

- Eliminating unlawful discrimination, harassment and victimisation by ensuring that awareness of the Social Security Scotland Human Resources People Policy was adhered to and promoted for awareness for all specially line manager who would follow guidance to support their team members
- Advancing equality of opportunity for all Social Security Scotland colleagues by ensuring that facilities in building were suitable for all.
- Promoting good relations together with the Social Security Scotland Human Resources People Policy and tools such as the employee passport would benefit colleagues, who for example are in the process of transitioning or bring awareness of pronoun use , along with creating a positive and inclusive culture for the organisation.

## **Race**

### **Potential Positive Impacts**

Social Security Scotland is a workplace which reflects the people of Scotland and our society.

Provide flexible spaces for people to eat in different ways, accommodating groups and sharing, not always at a table (canteen, break spaces)

Language, signage and wayfinding needs to take into account that English is not everyone's first language, need to think about imagery, symbols (linking to requirements for other protected characteristics e.g. Disability) to limit misunderstanding or various interpretations of spaces

Consideration of Gaelic in signage and wayfinding (online/internal)

Race equality network to support colleagues

Promotion of inclusivity through our culture and messaging.

### **Potential Negative Impacts/Potential Barriers**

Might be presented with discrimination from clients

Location of some buildings/route to work – are some groups more vulnerable/subject to abuse or threat (safety and security)

People need to be aware of the policies

Eating at desk culture in some areas, potential tension or conflict

Different level of security clearance for people from outside UK Government may impact on particular groups of people

### **Action**

Clear messaging to all colleagues and our clients that we are a zero tolerance employer. Along with clear guidelines for reporting and investigating any type of harassment by either a colleagues or a client.

Promoting a culture in which we celebrate different aspects of ethnicity and are willing to learn and engage with community leaders to ensure we continue to educate not only those who work in Social Security Scotland but also promote our payment to ensure maximum uptake of our grants and payments.

## **Public Sector Equality assessment**



These actions would support the three needs of the Public Sector Equality Duty by:

- This would relate to human resources people policy which details policies that affect our colleagues within Social Security Scotland. From our colleague engagement, the hybrid working trials would not impact people because of their race.
- This would relate to human resources people policy which details policies that affect our colleagues within Social Security Scotland. From our colleague engagement, the hybrid working trials would not impact people because of their race.
- This would relate to human resources people policy which details policies that affect our colleagues within Social Security Scotland. From our colleague engagement, the hybrid working trials would not impact people because of their race.

## **Religion or belief**

### **Potential Positive Impacts**

There is a prayer room in our offices.

Language, signage and wayfinding with user guide to spaces

### **Potential Negative Impacts/Potential Barriers**

No dedicated space for prayer (prayer room is multifunctional)

Might be presented with discrimination from clients

Location of some buildings/route to work – are some groups more vulnerable/subject to abuse or threat (safety and security)

Time off for religious reasons which might correlate with appointments.  
Religious practices or observance need to be considered when making appointments

Are there particular geographic locations where there are religious/faith tensions

### **Action**

Our buildings have contemplation rooms which can be used by anyone who needs a quiet space at any time. Messaging around what these rooms are used for and when there are certain festivals or religious practices for priority use. Messaging around religious festivals in addition is a positive way to raise awareness for all colleagues and educate us in different ways to support our clients. It also allows a culture which we are sensitive when a colleague is fasting for a religious reason. For example, not eating food at our desk.

Clear guidance and use of an employee passport can support a colleague with the need to take time off for religious reason or prayer.

## **Public Sector Equality assessment**

These actions would support the three needs of the Public Sector Equality Duty by:

- Eliminating unlawful discrimination, harassment and victimisation by ensuring an awareness of the impact of Race for all colleagues working in a hybrid work environment.
- Advancing equality of opportunity for all Social Security Scotland colleagues irrespective of their race or ethnicity.
- Fostering good relations together with creating a positive, inclusive culture which respects cultural differences with colleagues.

## **Sex**

### **Potential Positive Impacts**

In our building we;

- Provide a choice of toilet facilities – for men and women (single sex spaces), where possible
- Time out / safe (emotional) spaces e.g. contemplation rooms
- Woman's toilet / changing facilities – privacy and dignity e.g. periods, menopause (not the latter not exclusively sex but higher proportion female)
- Nursing mothers (breast feeding) - spaces respectful of privacy and dignity
- Baby Changing facilities
- Bottle feeding spaces for parents and carers to feed children - space respectful of privacy and dignity

There are clear policies in place which make it easily accessible for anyone returning from paternity leave to have a safe space to express breast milk and secure refrigeration for storage. As part of the mandatory managers training there is a package in our e-learning which covers pregnancy and breast feeding

Hybrid working could benefit women who are going through menopause and help with symptom management.

Flexible spaces, availability of workstations at peak times and buildings closer to home can assist with caring responsibilities (for children) whilst not exclusively women it is a higher proportion.

New research commissioned by Vodafone Foundation has found that a third of workers experienced domestic abuse during the last 12 months, with more than half of those saying that abuse had increased during the COVID-19 pandemic. Domestic abuse calls have increased by an average of 60% during lockdown. Hybrid working could benefit victims of domestic abuse as it offers a 'safe space' away from the home. Employers can also look out for signs of domestic abuse by assessing behaviours and support their colleagues.

### **Potential Negative Impacts/ Potential Barriers**

Changing facilities for men not as private as for women

Changing/toilet facilities may not always be suitable for some men or some women, need to recognise the need for privacy within facilities

Men, on average taller than women, implications for furniture and seating – adjustable height (e.g. adjustable height workstations, adjustable height meeting tables) and mixed height furniture (e.g. the Jen Bench) and seating can address

Clients and people have preferences who will visit, we might not be able to always accommodate (mobile workers).

Women are more likely to have caring responsibilities which will have an impact on when and where they can travel. Along with being more likely to be the parent who will be called if child falls ill at school and needs cared for.

Single parent childcare may have an impact on where and when they can travel.

### **Action**

Monthly supported manager wellbeing conversations which build a strong relationship between manager and colleague to ensure appropriate support is given. This includes clear People Partnership guidance and support if there is a need for additional time off for caring responsibilities.

Support for those going through the menopause, this may include sitting in an area that has temperature control. Be mindful of back to back meeting especially being in an enclosed room.

Clear messaging around signposting colleagues for support available. This includes:

- Civil Servants charity
- Carers Support group and other equality networks,
- People Services which inc. the Wellbeing counselling services and support filling out the employee passport and access to Mental Health first aiders,
- Warmer Homes Scotland,
- Women's Aid,

- AIMS (abused men in Scotland),
- SAMH (Scotland Mental Health Charity)

## **Public Sector Equality assessment**

These actions would support the three needs of the Public Sector Equality Duty by:

- Eliminating unlawful discrimination, harassment and victimisation by ensuring an awareness of the Human Resources People Policy Impact for guidance on Maternity leave or Special Leave if required for caring responsibilities.
- Advancing equality of opportunity for all Social Security Scotland colleagues as flexible hybrid working model have proven to promote a healthier work/life balance.
- Promoting good relations together with the Social Security Scotland Human Resources People Policy and tools such as the employee passport could benefit colleagues, who for example are experiencing the menopause, along with create a positive and inclusive culture for the organisation.

## **Sexual orientation**

### **Positive Impact:**

Lesbian, Gay, Bisexual and Transgender friendly environments improve productivity, wellbeing and attract talent

Lesbian, Gay, Bisexual and Transgender networks to support colleagues

### **Negative Impact:**

Any access or use which would require disclosure

Location of some buildings/route to work – are some groups more vulnerable/subject to abuse or threat (safety and security)

Concern raised possibly over safety due to clients understanding or standards of behaviour, how do we make sure clients treat our people with dignity and respect. Risk of discrimination and harassment towards transgender people from clients.

### **Action**

Promotion of guidance and policy which support colleagues who are Lesbian, Gay, Bisexual and Transgender.

Signposting to available support and advice.

## **Public Sector Equality assessment**

These actions would the three needs of the Public Sector Equality Duty by:

- Eliminating unlawful discrimination, harassment and victimisation by ensuring an awareness of the Human Resources People Policy and how this supports the sexual orientation for colleagues working in a hybrid work environment.
- Advancing equality of opportunity for all Social Security Scotland colleagues could benefit colleagues sexual orientation as flexible hybrid working model have proven to promote a healthier work/life balance.
- Promoting good relations together with the Social Security Scotland Human Resources People Policy and tools such as the employee passport could benefit colleagues together with creating a positive and inclusive culture for the organisation.

## Care Experienced

### Potential Barriers

No awareness if colleague or client is care experienced, they may have been through a traumatic time however again they may not. It's making sure our people have the leaning and skills to support care experienced people.

Hybrid working could potentially not provide physically present support network making induction, building trust / relationships, and learning a job harder.

Homelessness or a 'hidden homeless' status, individual may live in shared accommodation or sofa surf therefore may not have access to internet or must use shared internet is higher for those who are care experienced. This could lead to several disadvantages including:

- Digital Exclusion or limited/no access to internet especially on that is secure. This may also mean the need to work in the office full time and not able to benefit from hybrid working.
- Security could also be an issue as there is no dedicated space to work in living environment.
- If individual has own bedroom or live in a bedsit this too means that their home becomes their workspace which could impact full-time on mental health as there is a low-quality work/life balance
- Impact on cost of working potentially higher i.e., travel costs and buying meals (no prep space where living) than those who only work in the office 2 days a week. In additional costs for heating / lightening whilst working from home particularly if in shared accommodation on in accommodation where fuel cards are used so it is disproportionately high
- Need for a locker for everyday use (unable to store laptop or work equipment at place of abode).

## Action

Promotion of employee passport especially when working in an environment which means manager can change on a regular basis can highlight specific support required.

Seeking support and advice from the corporate parenting group whose aim is to promote and educate colleagues on what we do as an organisation to support care experienced people and what more can be done. A small proportion of the membership have lived experience of being care experienced

## Public Sector Equality assessment

These actions would support the three needs of the Public Sector Equality Duty by:

- Eliminating unlawful discrimination, harassment and victimisation by ensuring an awareness of Social Security Scotland Human Resources People Policy and guidance to support colleagues who are child experience together with an understanding with appropriate trauma focused learning to allow a positive hybrid work environment.
- Advancing equality of opportunity for all colleagues could benefit people with care experience to promote a healthier work/life balance along with ensuring Social Security Scotland continues its remit of employing colleagues with lived experience.
- Promoting good relations together with the Social Security Scotland Human Resources People Policy and tools such as the employee passport could benefit colleagues along with create a positive and inclusive culture for the organisation.

## Marriage and Civil Partnership

### Impact

Although no specific impacts were identified, it was highlighted that hybrid working could be both beneficial and potentially detrimental to childcare and caring responsibilities depending on the flexibility of the hybrid model being tested.

## Caring

(the Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example HR policies and practices - refer to Definitions of Protected Characteristics document for details)

### Potential Positive Impacts

Plan childcare around days in office if fixed and balance with partner or ex-partner if separated

Beneficial to be able to go into an office if caring/childcare responsibilities are at home to get some reprieve and sense of identity

(for both childcare and caring responsibilities it was recognised that someone else in the household will be providing these duties however, this would not stop children/cared for person attending work).

Flexibility around days in which the office and managing medical, school, social care appointments. If appointment is in person the colleague will only need to travel to appointment and not from work.

Since the start of the pandemic a number of these appointments have been moved to online appointments where is not seen as being essential to be in person. This means an appointment can be done in the office in a private space reducing time travelling to and from appointment and waiting to be seen.

If caring for someone who has had an operation and stay in hospital the flexibility to continue working if the person needs minimal support.

Strong Carer Network with support from our wellbeing partners.

### **Potential Negative Impacts /Potential Barriers**

Unable to travel at certain times or days

Unable to book appointments later in the day in case they run over

Location might need to be close to who they care for

Hybrid model changed this would affect the caring/childcare at short notice so set days preferred.

Due to the nature of caring for someone with complex needs and regular medical intervention can mean to having more time off work than considered normal and also need to take leave at short notice, meaning work that needs to be done to meet timelines can create stress. This in turn means the colleague can feel that they are not contributing to their team or overlook for opportunities which can support promotion.

Higher anxiety around potential Coronavirus outbreaks in office or coming into contact with positive person while travelling to work and caring for someone who is immune-suppressed.

### **Action**

Social Security Scotland continues to work towards being an inclusive workplace and offer tools like the carers passport which identifies to managers the support and structure required to support a colleague caring for someone. As an organisation we offer a Carer Support network and currently working towards be able to promote ourselves as a carers positive workplace

There is access to flexible leave to manage appointment or having fixed days and hours when required to manage caring responsibilities.

## 5. Decision making and monitoring

### **How has the Equality Impact Assessment analysis shaped the proposed activity process so far?**

Work on the Equality Impact Assessment has identify many barriers through engagement sessions and workshops there are some barriers that may inhibit hybrid working for those with protected characteristics missed. It should be acknowledged that some protected characteristics can be temporary.

By recognising many of the barriers which are still in place we will identify who the owner is to getting this corrected.

Through our communications team we will continue to engage with all colleagues promoting a culture which has 'Dignity, Fairness and Respect' as its core value.

We will continue to engage with colleagues to collect their experiences and feedback to ensure we are getting hybrid working right, continuing to identify the barriers to hybrid working and making they are fed back to the correct division to be fixed.

### **How will the Equality Impact Assessment analysis help develop better outcomes for people and communities?**

Many positive impacts have been identified through the Equality Impact Assessment. In August 2022 Social Security Scotland achieved 'Disability Confident level 2' for our recruitment practices. This is a recognition of us being an inclusive and accessible employer and reflects are values. It is essential this continues as part of our ethos is that Social Security Scotland colleagues should reflect the people of Scotland who we are serving.

We will continue to learn and develop as an organisation, and this can be done through our:-

- Policies and guidance
- Estates around Scotland
- Our culture - set out in [Social Security Scotland Charter](#) and [Corporate Plan](#) ,
- Our colleagues - how and who we recruit, strong leadership which demonstrates inclusivity at every point,
- How we communicate with one another and how we communicate to the people of Scotland the work we are doing



## **How will the activity be monitored going forward?**

Once the Our Ways of Working project has been concluded this will go to Business as usual and the change team. They in turn will collaborate with the insight and analysis team to design a plan for the best ways to engage with colleagues to ensure they are having the best experience possible working for Social Security Scotland and with the hybrid model used in their division.

## **Authorisation**

### **Declaration**

I am satisfied with the Equality Impact Assessment that has been undertaken and give my authorisation for the results to be published on the Social Security Scotland website.

**Name:** *Janet Richardson*

**Position:** Deputy Director

**Date:** 29<sup>th</sup> September 2022

## List of References

<p>All Characteristics</p>	<p>All characteristics were reference in the following:</p> <ul style="list-style-type: none"> <li>• Framing workshop with external stakeholders</li> <li>• Engagement sessions with internal colleagues</li> <li>• Pulse survey with colleagues</li> <li>• Central Property Equality Impact Assessment</li> <li>• Accessibility and Inclusion Equality Impact Assessment</li> <li>• <a href="#">Corporate Plan 2020 -2023 - ISBN 978-1-80004-391-6 (1).pdf</a></li> <li>• <a href="#">Social Security Scotland - Our Charter</a></li> <li>• <a href="#">People Plan 2020-2023 25 March 2021.pdf</a></li> </ul> <p>In '3. Data and evidence gathered' section a full note of engagement done by or on behalf of the project can be found. All addition information was found from the following sources</p>
<p>Age</p>	<ul style="list-style-type: none"> <li>• Do different age groups work more productively at different times / environments?</li> <li>• Orangebox Smart Working 'The Sticky Campus and new dynamics of Smart learning' (2020)</li> <li>• Equalities Outcomes and Mainstreaming Report 2019</li> <li>• Labour Market – Public Sector Workforce Statistics 2013 - 2018 (proportion of Scottish Government workforce under 30 is increasing)</li> <li>• Smarter Workplaces Programme: Victoria Quay Live Lounge conversations</li> <li>• Modern Apprentices and Graduate Trainee Networks</li> <li>• <a href="#">Four Generations in the Workplace - MBA Knowledge Base (mbaknol.com)</a></li> <li>• <a href="#">Four-generation workplaces on the rise as report reveals the future of work - GOV.UK (www.gov.uk)</a></li> </ul>
<p>Disability</p>	<ul style="list-style-type: none"> <li>• Accessibility Audits for Victoria Quay and Saughton House (2018)</li> <li>• A Fairer Scotland for People with a disability: Employment Action Plan (2016)</li> <li>• Equalities Outcomes and Mainstreaming Report (2019)</li> <li>• Hate Crime in Scotland (2010-2018) (increased reporting)</li> <li>• Labour Market – Public Sector Workforce Statistics 2013-2018 (disabled colleagues increasingly comprise more of the organisations workforce)</li> <li>• People Survey 2019</li> <li>• Recruitment and Retention Plan for People with a disability (2019)</li> <li>• Reasonable Adjustments Discovery Report (2019)</li> <li>• National Autistic Society – Autism Friendly environmental review Victoria Quay and Saughton House (2018)</li> <li>• Chartered Institute of Personnel and Development – Building inclusive workplaces: assessing the evidence Research Report (2019)</li> <li>• Her Majesties Revenue Centre Design Guide (2018)</li> </ul>

	<ul style="list-style-type: none"> <li>• Smarter Workplaces Programme – VQ Live Lounge Evaluation (2017, 2019)</li> <li>• Smarter Workplaces Programme – Shhh Space Evaluation (2018)</li> <li>• Smarter Workplaces Programme – Team Space Evaluation (2019)</li> <li>• Yammer Groups (Disability, Neurodiversity, Mental Health, and Wellbeing)</li> <li>• Networks (Disability Forum, Neurodiversity, Mental Health, and Wellbeing)</li> <li>• Inclusion Scotland Conference 2019</li> <li>• Edinburgh Access Panel 2019</li> <li>• The Welsh Government – Social Disability Model language</li> <li>• UK Government – UK Home Office Accessibility Do's and Don'ts</li> <li>• Her Majesties Revenue Centre Design Guide</li> <li>• Smart Working PAS3000 (2016)</li> <li>• British Code of Practice for accessibility and inclusivity of buildings BS8300</li> <li>• Accessibility and Inclusivity Review Report for Agnes Husband House (January 2021)</li> <li>• Disability Equality Scotland Accessibility and Inclusivity Panel</li> <li>•</li> </ul>
Sex	<ul style="list-style-type: none"> <li>• Labour Market – Public Sector Workforce Statistics 2013-2018 (women comprise an increasing majority of the workforce)</li> <li>• Equalities Outcomes and Mainstreaming Report (2019) (82% of part-time workers in 2018 were women, colleagues on maternity leave are taking longer off (78% taking 40-52 weeks)</li> <li>• Women's Network Group, Carers Network, Part-time Working Network</li> <li>• Refuge <a href="https://www.nationaldahelpline.org.uk/">https://www.nationaldahelpline.org.uk/</a></li> <li>• Vodafone (2019) research commissioned from Klynveld Peat Marwick Goerdeler</li> </ul>
Gender Reassignment	<ul style="list-style-type: none"> <li>• Labour Market – Public Sector Workforce Statistics 2013-2018</li> <li>• Equalities Outcomes and Mainstreaming Report (2019)</li> <li>• Scottish Government Equality Outcomes: Lesbian, Gay, Bisexual and Transgender Evidence Review (2013)</li> <li>• Government Equalities Office – Providing services for transgender customers A Guide (2015)</li> <li>• Equality and Human Rights Commission - gender reassignment discrimination</li> <li>• UK Government - National Lesbian, Gay, Bisexual and Transgender Survey: Research report (2018)</li> <li>• Hate Crime in Scotland (2010-2018) (small numbers but increasing)</li> <li>• Scottish Transgender Alliance</li> <li>• Lesbian, Gay, Bisexual and Transgender+ Committee, Lesbian, Gay, Bisexual and Transgender+ Network, Lesbian, Gay, Bisexual and Transgender+ Allies</li> </ul>
Sexual Orientation	<ul style="list-style-type: none"> <li>• Labour Market – Public Sector Workforce Statistics 2013-2018 (declaration rates increased, still unknown for 34% of workforce)</li> <li>• Equalities Outcomes and Mainstreaming Report (2019)</li> <li>• People Survey 2019</li> <li>• Scottish Government Equality Outcomes: Lesbian, Gay, Bisexual and Transgender Evidence Review (2013)</li> <li>• UK Government - National Lesbian, Gay, Bisexual and Transgender+ Survey: Research report (2018)</li> <li>• Hate Crime in Scotland (2010-2018) (sexual orientation 2nd most common reported, year on year increases)</li> </ul>

	<ul style="list-style-type: none"> <li>• Lesbian, Gay, Bisexual and Transgender+ Allies</li> </ul>
<b>Race</b>	<ul style="list-style-type: none"> <li>• Labour Market – Public Sector Workforce Statistics 2013-2018 (minority ethnic colleagues increasingly comprise more of the organisations workforce)</li> <li>• Equalities Outcomes and Mainstreaming Report (2019)</li> <li>• People Survey 2019</li> <li>• Hate Crime in Scotland (2010-2018) (racial reporting most common, downward trend)</li> <li>• Race and Equalities Network</li> <li>• National Records of Scotland Gaelic Map (2015) (difference of those speaking the language (66%) and those who understand it (27%) who can read and write; proportion of people who can speak Gaelic increased slightly in younger age groups)</li> </ul>
<b>Religion or Belief</b>	<ul style="list-style-type: none"> <li>• Labour Market – Public Sector Workforce Statistics 2013-2018 (declaration rates have increased since data gathering)</li> <li>• Equalities Outcomes and Mainstreaming Report (2019) (for religion 37.4% declare 'none')</li> <li>• People Survey 2019</li> <li>• Hate Crime in Scotland (2010-2018)</li> <li>• Race and Equalities Network, Faith Network</li> </ul>
<b>Marriage and Civil Partnership</b> (The Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example HR policies and practices - refer to Definitions of Protected Characteristics document for details)	
<b>Care Experienced</b>	<ul style="list-style-type: none"> <li>• <a href="https://www.statistics.gov.uk/whocarescotland">Statistics - whocaresscotland.org</a></li> <li>• 1:1 Engagement session with colleagues who are care experienced</li> </ul>
<b>Caring</b> (The Scottish Government does not require assessment against this protected characteristic unless the policy or practice relates to work, for example HR)	<ul style="list-style-type: none"> <li>• Opportunities to encourage and enable more remote working and develop a hybrid model e.g., 'Home, Hub, Hive'</li> <li>• Future Estate Strategy and Accommodation Policy provide for a smaller core but wider shared workspace footprint</li> </ul>

policies and practices -  
refer to Definitions of  
Protected Characteristics  
document for details)