

## **Audit Scotland Equality Impact Assessment**

Policy Title	Recruitment & Selection Policy
Strategic Outcome	AS recognises that the recruitment and selection of the most suitable talented employees is critical to business success. Demonstrating fair recruitment and selection practices which meet all legal obligations and ensure fair and objective decision making is an essential requirement. We also actively seek to promote equality of opportunity for all actual and potential applicants through employing best practice recruitment and selection methods.
Directorate	Corporate Services
We have completed the equality impact assessment for this policy.	Name: David Blattman  Position: HR & OD Manager  Date: 18 January 2010
Authorisation by Director	Name: Diane McGiffen  Position: Director of Corporate Service  Date: 30 June 2010
Authorisation by the Diversity & Equality Steering Group Chair on behalf of the DEWG members	Name: Lorna Meahan  Date: 30 June 2010

**Once the EQIA documentation has been completed and signed off arrangements will be made by the DEWG and communications team to publish the equality impact assessment on Audit Scotland's website.**

## **Step 1: Define the aims of the policy**

<p>What is the purpose of the proposed policy (or changes to be made to the policy)?</p>	<p>Ensuring a fair, objective and consistent recruitment and selection process which generates the most suitable candidates for vacancies arising. This includes the key stages of:</p> <ul style="list-style-type: none"> <li>- Resource Planning</li> <li>- Attraction of candidates (through adverts and/or agencies)</li> <li>- Selection processes (short-listing, interviews and assessment centres)</li> <li>- Assessment and Decision-making</li> <li>- Recruitment Administration</li> </ul> <p>The existing policy has been in operation since 2001 and is currently being reviewed using the Best Value approach to ensure it is fit for purpose. Recommendations for improvement will be made as part of this process and the equality impact of all proposed changes is being considered as the work develops.</p>
<p>Who is affected by the policy or who is intended to benefit from the proposed policy and how?</p>	<p>All current and prospective employees who apply for vacancies are directly affected by this policy. In addition, all staff and Audit Scotland clients are indirectly affected as the standard of recruitment &amp; selection has an effect on the competence and skill levels across the organisation by ensuring the most appropriate skilled candidates are recruited.</p>
<p>How have you, or will you, put the policy into practice, and who is or will be responsible for delivering it?</p>	<p>Existing policies and practices are already in place and are overseen by the HR function in terms of ensuring that policies are fit for purpose. All Line managers are responsible for following policy and effectively using the guidance provided. Amendments to practice following the BV review will be approved by Senior Management and HR are responsible for communicating changes and ensuring recruiting managers have the necessary skills and competence to follow the policy.</p>
<p>How does the policy fit into our wider or related policy initiatives?</p>	<p>The Recruitment &amp; Selection policy is part of a suite of HR policies and procedures and has specific relevance to the Equality &amp; Diversity policy, Induction and Training policies plus all employee benefits policies.</p>
<p>Do you have a set budget for this work?</p>	<p>A recruitment and selection budget is set each year for actual recruitment campaigns. The BV Recruitment review is funded by the HR budget and the scope of the BV review includes a consideration of costs and efficiency in current recruitment practices.</p>

## Step 2: What do you already know about the diverse needs and/or experiences of your target audience?

### For existing staff:

Do you have information on:		
Age	Yes	
Disability	Yes	
Gender	Yes	
Lesbian, Gay, Bisexual & Transgender	No	Not currently collected
Race	Yes	
Religion and Belief	Partially	New recruits only

### For applicants:

Do you have information on:		
Age	Yes	
Disability	Yes	
Gender	Yes	
Lesbian, Gay, Bisexual & Transgender	No	Not currently collected
Race	Yes	
Religion and Belief	Yes	

Age	<p><b>Evidence</b>  <i>Existing staff</i> – age is monitored by age brackets &lt;25, 25-34, 35-44, 45-55 and &gt;55  <i>Applicants</i> – age is monitored by the above age brackets. In the 2007/8<sup>1</sup> HR monitoring report a statistic requiring further investigation is that 16% of applicants for the recruitment period are aged 45-55 but only 4.1% of appointees fall into that same age bracket.</p> <p><b>Consultation</b>            Research has been conducted with recent recruits and recruiting managers on the recruitment process in general and questions of equality and diversity were covered. No mention of age related bias was made.</p>
Disability	<p><b>Evidence</b>  <i>Existing staff</i> – An overview of percentage numbers can be obtained by responses to the 2008 staff opinion survey (showing 11 staff declaring a disability). This information was limited and only constituted a Yes or No response with no details of the disability. Following a disability monitoring exercise in 2009, 15 staff declared having a disability and were contacted to allow us to better tailor our support for this particular group of staff and target our resources accordingly.</p> <p><i>Applicants</i> – data is collected at the recruitment stage and shows that for 2007/8 1.9% of applicants declared a disability but none was appointed. 7% of applicants declined to disclose whether they had a disability or not. All applicants are asked if they have any additional requirements or need any adjustments in the recruitment process. Requests have been minimal to date.</p>

<sup>1</sup> Equality monitoring data from 2007/08 was used to evidence what we know about the diverse needs of our target audience. This was the most recent data available at this time.

	<p><b><u>Consultation/Involvement</u></b></p> <p>The recruitment process was the subject of a consultation event held in September 2008 involving disabled individuals through the organisation Capability Scotland. Attendees shared their views and opinions on the current recruitment process with particular reference to the barriers faced by disabled people in securing employment. Recommendations for change were made particularly in relation to:</p> <ul style="list-style-type: none"> <li>- Attracting candidates with disabilities</li> <li>- Sensitive collection of data and information through the application form, pre-employment health questionnaire and diversity monitoring form</li> <li>- Effectively wording recruitment adverts</li> <li>- Making appropriate adjustments to selection methods including interviews.</li> </ul> <p>These are fully documented in the Consultation report and referenced in Step 5 of this EIA to show which changes are to be adopted.</p>
Gender	<p><b><u>Evidence</u></b></p> <p><b><i>Existing staff</i></b> – Full data exists on the current staff profile and applicants with regards to gender and shows:</p> <ul style="list-style-type: none"> <li>- current staff - Male - 50.5% Female - 49.5%</li> </ul> <p><b><i>Applicants</i></b>- Full data exists and is monitored at three Stages (applications received, applications shortlisted and appointments made). In 2007/8 for both male and female applications, 39% of those received were shortlisted. Fewer males (32) than females (42) were appointed as was the case in the previous analysis for 2006. As a percentage of applications received, 9.4% (9.6% in 2006) of female applications compared to 6.5% (2.4% in 2006) of male applications were appointed. An analysis of recruitment process documentation by an external consultant did not surface any obvious bias although there were gaps in the recruitment paperwork which meant this review could not be totally comprehensive.</p> <p><b><u>Consultation</u></b></p> <p>Research has been conducted with recent recruits and recruiting managers on the recruitment process in general but questions of equality and diversity were covered. No mention of gender related bias was made.</p>
Lesbian, Gay, Bisexual & Transgender	<p><b><u>Evidence</u></b></p> <p>No data has been collected about sexual orientation of existing staff or applicants. We are aware that lesbian, gay, bisexual and transgender individuals may feel uncomfortable or even discriminated against if a heterosexual majority assumption is made by interviewers.</p> <p><b><u>Consultation</u></b></p> <p>No consultation has taken place.</p>
Race	<p><b><u>Evidence</u></b></p> <p><b><i>Existing Staff</i></b> – data exists for existing staff and shows that at March 2008 1.8% of staff were from an ethnic minority background. This compares with 2.5% of people in employment in Scotland.</p> <p><b><i>Applicants</i></b> – data is available and shows that 8.6% of applicants; 4.2% of those shortlisted; and 1.4% of those appointed are from an ethnic minority background. In terms of success in the recruitment process 18.8% (44% in 2006) of ethnic minority applicants were shortlisted and 1.2% (4% in 2006) were appointed. This compares with 41% shortlisted (35% in 2006) and 7.8% appointed (6% in 2006) for white candidates. Overall in the 2007/8 period, ethnic minority applicants have been significantly less successful at the shortlisting and interviewing stage – both in comparison to white candidates and in comparison to ethnic minority applicants in 2006.</p>

	<p><b><u>Consultation</u></b>  Research has been conducted with recent recruits and recruiting managers on the recruitment process in general and questions of equality and diversity were covered. No mention of race related bias was made.</p>
Religion and Belief	<p><b><u>Evidence</u></b>  <b><i>Existing Staff</i></b> – no data is available but only for recent recruits and not collated.</p> <p><b><i>Applicants</i></b> – data is collated and shows that the applicant profile is roughly comparable with Scottish census data. Most notable is the fact that 2.1% (21) of applicants declared themselves to be Muslim (compared to 0.84% of the Scottish population) and although 25% of Muslim applicants were interviewed none was appointed. Again no obvious bias was determined when recruitment process documentation was reviewed. Also 38.4% of applicants said they had no religion and 11% failed to provide any information. This is a high level of non-disclosure compared with the census data of 5.4% non disclosed.</p> <p><b><u>Consultation</u></b>  Research has been conducted with recent recruits and recruiting managers on the recruitment process in general and questions of equality and diversity were covered. No mention of religion related bias was made.</p>

**Step 3: What else do you need to know about to help you understand the diverse needs and/or experiences of your target audience?**

Age	Do you have enough information to proceed?	<b>Yes</b>	
	<p>Previous comparison with National Statistics and Census data was difficult as the age bands were different. In 2009, Audit Scotland converted its age data into the following standard age bands – &lt;24, 25-34, 35-44, 45-54, 55-64, and &gt;64 and then data can be compared with the working population and census information.</p> <p>A sample of recruitment documentation/interview notes for older candidates should be reviewed from recent campaigns and going forward particular attention should be paid to monitoring the success rates of older applicants at the shortlisting and interview stage.</p>		
Disability	Do you have enough information to proceed?		<b>No</b>
	<p>Although extensive feedback has been gained from consultation with disabled people from Capability Scotland (regarding recruitment documentation, attraction strategies and selection processes) there is still a need to further analyse the actual experiences of disabled applicants for Audit Scotland vacancies and a need for more information on the staff disability profile to effectively monitor this going forward.</p>		
Gender	Do you have enough information to proceed?	<b>Yes</b>	
	<p>A sample of recruitment campaigns in 2009 can be followed up with questionnaires to interviewees in order to gain opinion on the recruitment and selection process and to determine if there are any gender differences in experience.</p>		

Lesbian, gay, bisexual and transgender	Do you have enough information to proceed?	<b>Yes</b>	
	<p>LGBT data is not currently collected. Interviewers have no knowledge of the candidate's sexual orientation, while we could assume that for the most part discrimination is not occurring, we still need to protect candidates from unconscious bias or assumptions being made by interviewers. This must be covered in interview training on an ongoing basis.</p> <p>Further information has been sourced from Stonewall and other bodies regarding general experiences of people of different sexual orientation during requirement.</p>		
Race	Do you have enough information to proceed?		<b>No</b>
	<p>We need to understand why ethnic minority applicants have performed less successfully in recent recruitment campaigns and monitor this on an ongoing basis.</p> <p>For understanding the interview experience, Agencies are looking into the possibility of contacting previous applicants to review their recruitment experience but this needs to be considered carefully as significant time may have lapsed since their interview. Feedback can be collected from now on and for future recruitment and the format for doing this needs to be discussed.</p>		
Religion and Belief	Do you have enough information to proceed?	<b>Yes</b>	
	<p>We need to encourage a higher level of disclosure on religion by careful positioning and explanation of why we collect this data on the monitoring form.</p>		
All Strands	<p>Meetings have been held with the key recruitment agencies and candidate management company to explain the importance of equality considerations in their part of the process. Copies of their policies have been obtained and reviewed. This now needs to be followed up with an equalities questionnaire (to all agency suppliers) to gather data, information and evidence on actual current practice.</p>		

**Step 4: What does the information you have tell you about how this policy might impact positively or negatively on the different groups within the target audience?**

Age	<p>Recruitment monitoring has indicated that older applicants are less successful in the recruitment process. Although the review of recruitment documentation has not surfaced any obvious bias, and that internal staff consulted have not indicated any concerns, this is still an area we would like to explore further. The recruitment policy itself is designed to promote equality and supporting training reinforces this, however we need further evidence to be sure that the outcomes for older candidates are genuinely related to accurate assessment of skills and competence and not affected by any unconscious bias by interviewers or any barriers in the recruitment processes which disadvantage older applicants.</p>
Disability	<p>With regard to disability the issue is a low attraction rate in comparison to the number of disabled people in society. We know this is a common issue for many organisations. We suspect that the improvements we are already implementing regarding how we collect information on disability will have a positive effect however we also need to look at attraction strategies for disabled candidates and challenge our recruitment agency partners in this regard.</p>

Gender	There has already been a positive shift in the success rates of male applicants in comparison to female applicants following the analysis in 2006 which showed significantly fewer males were appointed. The reality is that we do not have a clear picture of what may have caused this effect and even though there has been improvement we must not be complacent and must continue to monitor this closely.
Lesbian, Gay, Bisexual & Transgender	As data is currently not collected on sexual orientation we have no indication of attraction statistics or success rates at different stages of the recruitment processes. We also have not had any anecdotal evidence that there are any particular positive or negative effects on LGBT staff.
Race	The statistics show that ethnic minority applicants have significantly less success at various recruitment stages than white candidates. Although the review of recruitment documentation has not surfaced any obvious bias, and internal staff consulted have not indicated any concerns, this is still an area we would like to explore further. The recruitment policy itself is designed to promote equality and supporting training reinforces this, however we need further evidence to be sure that the outcomes for ethnic minority candidates are genuinely related to accurate assessment of skills and competence and not affected by any unconscious bias by interviewers or any barriers in the recruitment processes which disadvantage ethnic minority applicants.
Religion and Belief	We have found that a large proportion of recruitment candidates are not disclosing information regarding their religious beliefs. From those that do disclose this information, our monitoring data suggests that there is a lower success rate for Muslim applicants. The recruitment policy itself is designed to promote equality and supporting training reinforces this, however we need further evidence to be sure that the outcomes for Muslim candidates are genuinely related to accurate assessment of skills and competence and not affected by any unconscious bias by interviewers or any barriers in the recruitment processes which disadvantage Muslim applicants.

## **Step 5: Will you be making any changes to your policy?**

Are there any changes?		
Age	Yes	
Disability	Yes	
Gender	Yes	
Lesbian, Gay, Bisexual & Transgender	Yes	
Race	Yes	
Religion and Belief	Yes	

Please identify:

- what action you will take,
- who will take that action, and
- when that action will be taken

The immediate changes we are making are as follows:

### **Age**

1. We will undertake a review of recruitment information in order to assess whether any indirect

discrimination or barriers are occurring for older workers

We have not been able to determine with any certainty whether the statistical data of applicant success rates (analysed by different diversity groups) indicates any clear evidence of indirect discrimination. We do know that, when applicants meet recruiting managers at assessment centres and final panel interviews, certain groups are less successful than others (age, ethnicity & religion).

As part of the new approach to recruitment which is being launched from April 2010 Audit Scotland will be adopting a very different approach to up-skilling those involved in recruitment. A team of professional recruiters is being established across the business and these staff will attend training courses which will include modules on equality & diversity. All other managers who are involved in panel interviews will also attend single day training. The training has been designed by Capita and Audit Scotland's HR & OD team and will be delivered by Capita trainers. This will be rolled out gradually during 2010 with an early expectation that it will be a mandatory requirement prior to recruitment involvement after January 2011. Staff will be given feedback and coached if there is evidence of direct or indirect discrimination during actual assessment centres or interviews. It should be noted that the statistical data is based upon relatively small numbers and so any perceived statistical trend cannot be considered statistically safe. The annual diversity monitoring report produced by HR during the Autumn of 2011 will compare the impact of this change.

### **Disability**

2. We will continue to obtain better information about the disabilities and impairment that existing staff, new recruits and applicants have. This will allow us to better tailor our support for this particular group of staff and target our resources accordingly.

We asked existing staff to disclose any disability or impairment as part of the *2009 Annual Details Update* process. Fifteen staff responded and a follow up call was made to ask these staff if there was any further assistance that they required from Audit Scotland. Two members of staff are currently considering our offer for further assistance through occupational health.

3. We will examine how we can improve the process, communication and experience of applicants with disabilities / impairment so that a larger number of such individuals are encouraged to apply.

We have established relationships with Deaf Action, Capability Scotland and Able Magazine to ensure that the Audit Scotland brand is perceived as more accessible for applicants with disabilities and impairment. Reference is made to this within our recruitment website pages. The website itself is accredited by The Shaw Trust allowing users to hear the text in audio format. We ran a brand awareness advert in Able Magazine during late 2009 and we have committed to a further advert and editorial during September 2010 to try and promote our graduate recruitment scheme. Deaf Action also circulated details of the 2009 graduate recruitment cycle amongst a host of network and community groups. The annual diversity monitoring report produced by HR during the Autumn of 2010 & 2011 will compare the impact of this initiative.

### **Lesbian, Gay, Bisexual & Transgender**

4. We will continue to discuss with our Diversity Equality Steering Group the opportunity and readiness for collecting information about lesbian, gay bisexual & transgender applicants and staff.

We identified that we did not hold any information about staff sexual orientation. The DESG has previously indicated that it would keep this matter under review.

### **Race**

5. We will review and try to better understand why applicants from certain race and religious backgrounds appear to perform less well through our selection process compared to other groups.

See item 1.



### Religion and Belief

6. We will examine what can be done to try and encourage more applicants to complete information about religion & belief.

We have redesigned the diversity questionnaire to try and encourage more applicants to provide information about their religion and belief. The annual diversity monitoring report produced by HR during the Autumn of 2010 will compare the impact of this change. Further investigation will take place to be sure that the outcomes for Muslim candidates are genuinely related to accurate assessment of skills and competence and not affected by any unconscious bias by interviewers or any barriers in the recruitment processes which disadvantage Muslim applicants.

### All Strands

7. Training of recruiting managers will be improved as part of the Best Value Review of Recruitment & Selection project. This will include training on LGBT and the recruitment process.

See item 1.

A review of progress was undertaken during January 2010 and a briefing was provided to the Diversity & Equality Steering Group thereafter.

The ongoing work has now been effectively mainstreamed within the recruitment & selection improvement project and ongoing annual diversity monitoring report. The annual report is submitted to the Diversity & Equality Steering Group for comment each year.

Further changes may be made as we gather more evidence and information going forward.

## **Step 6: Does your policy provide the opportunity to promote equality of opportunity or good relations by altering the policy or working with others?**

Age	Yes	
Disability	Yes	
Gender	Yes	
Lesbian, Gay, Bisexual & Transgender	Yes	
Race	Yes	
Religion and Belief	Yes	

Age	<p>The overall recruitment policy is designed to promote equality of opportunity. We need to ensure that all interviewers are fully trained in equal opportunities issues and that recruitment documentation is checked for bias.</p> <p>There are further opportunities to promote equality of opportunity in the collaborative relationships with recruitment partners. In particular we need to ensure the following:</p> <ul style="list-style-type: none"><li>- Effective equal opportunities monitoring at all stages including production of MI</li><li>- SLAs with recruitment partners which emphasise good practice in equal opportunities</li><li>- Consideration and implementation of Positive Action activity</li></ul>
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	to improve the attraction of candidates from minority groups.
Disability	As above
Gender	As above
Lesbian, Gay, Bisexual & Transgender	As above
Race	As above
Religion and Belief	As above

**Step 7: Based on the work you have done - rate the level of relevance of your policy**

*Tick one box for each strand*

	Age	Disability	Gender	LGBT	Religion and belief	Race
<b>High</b> - There is substantial evidence that people from different groups or communities are (or could be) differently affected by the policy (positively or negatively) - There is substantial public concern about the policy, or concerns have been raised about the policy's potential impact by relevant bodies - The policy is relevant to all or part of the respective general duty, in the case of race, disability and gender.						
<b>Medium</b> - There is some evidence that people from different groups or communities are (or could be) differently affected (positively or negatively). - There is some public concern about the policy. - The policy is relevant to parts of the respective general duty, in the case of race, disability and gender.	*	*				*
<b>Low</b> - There is little or no evidence that some people from different groups or communities are (or could be) differently affected (positively or negatively). - There is little or no evidence of public concern about the policy.			*			

- The policy has little or no relevance to the respective general duty, in the case of race, disability and gender.						
<b>Unknown</b> - No evidence or data has been collected therefore an assessment cannot be made				*	*	

**Step 8: Is a further impact assessment required?**

Age	Yes	
Disability	Yes	
Gender		No
Lesbian, Gay, Bisexual & Transgender		No
Race	Yes	
Religion and Belief	Yes	

If you have answered yes please explain why

With regards to Race and Age and Religion there is evidence of less success at various selection stages for older applicants and applicants from ethnic minority backgrounds and applicants with certain religions. Although there was no evidence of obvious bias discovered in the review of recruitment documentation in recruitment documentation, we would still like to ensure through further analysis that there is not inadvertent discrimination happening and/or unidentified barriers affecting performance. We need to do further research on active recruitment campaigns going forward as it is difficult to do this retrospectively.

With regards to Disability, the main issues appear to be attracting disabled candidates in the first place and encouraging disclosure of disability information during the recruitment stages. Again, we need to explore this further.

Overall, the intent of the policy is well founded and aims to promote equality of opportunity and eliminate discrimination. It is the *application* of the policy that needs further exploration to ensure a robust consideration for equality matters.

## **Step 9: Explain how you will monitor and evaluate this policy/function or strategy to measure progress?**

Please explain how monitoring will be undertaken, when it will take place and who is responsible for undertaking it.

The HR team will continue to produce the annual diversity monitoring report which is submitted to the Diversity and Equality Steering Group each year and is published on Audit Scotland website.

The aforementioned changes have now been effectively mainstreamed within the recruitment & selection improvement project and an evaluation of these changes to our recruitment and selection process is scheduled for May 2011.

## **Step 10: Summary of improvements, outcomes and impact**

Please summarise in no more than 200 words the nature of the policy and main improvements, outcomes and impact as a result of this review – this will be published on Audit Scotland’s website and the full EqIA will be made available to interested parties if requested.

The purpose of the policy is to ensure a fair, objective and consistent recruitment and selection process which generates the most suitable candidates for vacancies arising. The following improvements have been made following this review:

**Attraction** – the quality and content of potential recruitment adverts has been reviewed, making them more aligned to the roles/competencies. We have committed to further advertising and editorials within disabled publications to increase awareness of our organisation.

**Selection** - The review has resulted in a selection process which is more aligned to key competencies for each vacancy. This has been achieved through the creation of a suite of selection tools which are directly linked to competencies and roles; thus reducing the possibility of inequality within the selection process. In addition, (where possible) assessments and interviews will be combined in one event. This should result in recruitment decisions being made which are based on all the information that has been received throughout the process; not focusing on, for example, performance at interview alone.

**Recruitment Community** – this has been created to increase the skill and competence level for a group of individuals across the organisation who are involved in recruitment on a regular basis. This includes an advanced training session which makes particular reference to equality and diversity issues. In addition, all staff involved in the interview process will attend an essentials training course, which covers diversity and equality issues. Both act as a quality assurance tool.

A thorough review of the recruitment and selection process will take place during May 2011, once the changes have been fully embedded.