

Equality Impact Assessment – Employee Passport Scheme

Date of the assessment

September – December 2024

Name of policy or procedure

Employee Passport scheme

What does this policy or procedure aim to achieve?

Purpose and background

Employee passport schemes are becoming more popular and we would like to introduce this at Audit Scotland. The creation of an employee passport is in recognition that each colleague has circumstances which may impact their work at some point in their career, whether on a short-term, long-term or permanent basis.

The passport scheme can be a vehicle to enable informal and positive conversations about ways of working, styles and factors that may be impacting on how people engage at and with their work.

Where more formal arrangements need to be considered such as a permanent change in working hours, existing formal routes such as making a statutory flexible working request should be instigated instead.

Part Two of the passport can be used for recording formal adjustments, as required by law, for those with a disability.

We all have circumstances which may impact our work at some point in our career. For some that might be a long-term or permanent health condition or disability that requires a legal workplace adjustment to remove barriers.

For others it may be carer or childcare responsibilities, pregnancy or fertility treatment, religious observance arrangements, or upcoming name changes – to name just a few – which could be supported through choosing to share this information voluntarily with those managers you are working with.

The Employee Passport offers a single, streamlined document for each colleague to set out the impact of their circumstances on them at work, and get support to enable them to perform at their best. This might be on a short term, long term, or permanent basis.

Setting out your circumstances and their impact can help chosen senior colleagues such as your line manager better understand the barriers you face, and more easily identify adjustments that could reasonably be adopted to support you.

Introducing the scheme may also encourage more colleagues with a disability to disclose this to a manager and to ensure they receive the support and adjustments required at work.

Each colleague will have full and exclusive control over who gets to see the information in their own passport. This is a voluntary scheme.

We have also considered how we are taking a human rights-based approach (HRBA) in relation to this scheme. This is about making sure that people's rights are put at the very centre of policies and practices.

Context for this EIA

By carrying out an EQIA now, we can use the findings alongside the draft employee passport form to consider our process before we consider approval to launch the scheme.

Consider the potential to eliminate discrimination, advance equality of opportunity and foster good relations. Use the table below to capture the evidence you’ve considered and the potential impacts you’ve identified. See EQIA guidance here.

Overall findings

All workforce data is taken from the Audit Scotland annual diversity and equality report published in 2024.

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?								
Age	At 31 March 2024, in Audit Scotland, the age distribution of our workforce is as follows¹: <table><tr><th>Age</th><th>Audit Scotland %</th></tr><tr><td>16-24</td><td>7.2</td></tr><tr><td>25-49</td><td>63.8</td></tr><tr><td>50-64</td><td>29.0</td></tr></table>	Age	Audit Scotland %	16-24	7.2	25-49	63.8	50-64	29.0	Menopause has the potential to impact the older generation more generally. This is the largest proportion of our workforce. Older members of staff may have a different view and understanding of neurodiversity as this has not always been so commonly addressed or supported. It may have the potential to make it harder for them to realise what adjustments may help themselves and others. Older employees might be less aware of concepts like employee passports and reasonable adjustments, and so this may need to be considered in communication around this to ensure they are not less likely to take part and miss out on the positive impact it could bring.
Age	Audit Scotland %									
16-24	7.2									
25-49	63.8									
50-64	29.0									

¹ [Annual diversity report 2023/43 \(audit.scot\)](#)

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
Disability	In March 2024, 7 per cent of staff considered themselves to have a disability. 44.3 per cent of colleagues have not disclosed this information. The 2024 Disability Confident Survey, run by the Audit Scotland Disability Confident Working Group, found that just over half of respondents had not recorded that they had a disability. The survey also found that although many felt comfortable discussing any adjustments need with their line manager, they felt less comfortable when it came to other managers or team members. Comments talked about changing teams or busy periods making it particularly difficult to have these conversations. There were also comments about the challenges faced when having to explain conditions that may not be well known, be invisible, or have stigma attached to them. Our Disability Confident Working Group fed into the EIA evidence that there will be a fear that the information shared may be used in the wrong way or not stored confidentially. To mitigate this, clear guidance, training for line managers and a data protection impact assessment should be provided. Employees will retain control of their passports through a secure one drive link and access can be provided or revoked as and when required by that individual.	We expect there to be a positive impact of introducing employee passports on disabled people. This is due to the requirement for reasonable adjustments to be put into place for those with a disability. Potentially a positive impact to be seen on disclosure rates if colleagues see the passports being successfully used to support those with a disability. Has the potential to have a positive impact on people's lives and help them to have equal opportunities at work, provided information is secure and used correctly. Having agreed adjustments in place that are then communicated to future managers/teams could have a positive impact on employees as it should overcome any issues around differences in acceptance/ understanding/ knowledge between managers, and help to have a more consistent experience for employees. For neurodiversity, attitudinal barriers may be challenging. There will be a need to raise awareness to ensure acceptance and understanding of differences and a recognition of strengths, rather than a focus on weaknesses. Some neurodivergent employees may have more difficulty with communicating their needs or feelings. There may be potential for negative impact too - if there are more requests for adjustments it could lead to managers/ teams

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
		reacting negatively because of their own views or lack of understanding despite the guidance being available.
Gender reassignment	We do not collect employee data on gender reassignment.	We expect there to be a positive impact of introducing employee passports on people due to their gender reassignment status. The scheme is voluntary, but if an employee is going through a gender reassignment they can choose to share this information with their manager / work manager in confidence. This could provide an additional support for them at work. Current levels of discrimination, ignorance and lack of acceptance are higher for this group within society. This may affect the level of confidence amongst this group and lead to lower take up.
Marriage and civil partnership	The workforce at Audit Scotland at 31 March 2024 is: 49.6% married/civil partnership 31.0% single 14.8% other 4.6% did not disclose	We expect there to be a positive impact of introducing employee passports on people due to their marital status. If an individual is facing a time of change from their marital status which then causes an impact to their working pattern (for example, having to drop the children at school each morning before work as they are splitting from a partner) then they can share this information in confidence, with those they are working with.
Pregnancy and maternity	Between 1 April 2023 and 31 March 2024, five women took maternity leave throughout the year.	Positive impact. For example if someone is breastfeeding / chest feeding on return to work, the passport could help to allow time away for expressing milk or finding a room in the office that is suitable.

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
		There may also be health adjustments required when a mother returns to the workplace.
Race	In March 2024 6.1 per cent of Audit Scotland staff identified as minority ethnic.	No impact noted.
Religion or belief	Our workforce have disclosed a variety of religion or beliefs with: 12.2% Church of Scotland 12.8% Roman Catholic 2.9% Muslim 9.2% another religion	Employees may require adjustments related to their faith. This has the potential to have a positive impact if this is agreed and recorded. However, it shouldn't mean that it is the staff member's responsibility to explain or justify their whole religion to those seeing the information. There also needs to be understanding that not everyone will have the same requirements.
Sex	In 2024, 56.8 per cent of Audit Scotland staff were female. Female employees are more likely than male counterparts to be employed on a part-time basis (38.3 per cent for females compared to 13.4 per cent for males in Scotland in 2020/21²) and are more likely to have caring responsibilities (in Scotland in 2022-23, 80 per cent of working age carers were female³). Growing evidence of the mental load of woman especially those in middle age who feel the squeeze from work, ageing parents, health (menopause), older children who still need as much care but in a different way with less additional support. This is often unseen. Recognition that traditionally men will be more reluctant to come forward as talking or revealing pressure. National Records of Scotland data shows that rates of	This should be able to have a positive impact on both men and women who have caring responsibilities, as well as other reasons to need adjustments, but this may require consideration on how to communicate and enable participation in this by men, who may be less likely to take this up.

² [Scotland's Labour Market: People, Places and Regions - Statistics from the Annual Population Survey 2020/21 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scotland-labour-market-people-places-regions-2020-21/pages/10.aspx)

³ [Carers Census, Scotland, 2022-23 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/carers-census-scotland-2022-23/pages/1.aspx)

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
	suicide in males is over three times as high as the rate for women. ⁴	
Sexual orientation	At Audit Scotland around 4.3 per cent of our workforce have disclosed they are LGBTQ+	No impact noted.
Socio-economic disadvantage	We do not collect employee data based on socio economic disadvantage at present. This will be reported on from data available at March 2025.	There is a potential positive impact for those at a socio-economic disadvantage as they can discuss options to work flexibly, thereby reducing the cost of regular commuting to an office. There is a potential negative impact as some people might not be willing to request reasonable adjustments due to perceived stigma about their background or being on a lower income.

Did you need to obtain further information? If yes, how did you do that?

Consultation was conducted with our PCS Union representatives and our employee diversity network groups. Further evidence considered is summarised below.

How to support employees with neurodiverse conditions - Employee Benefits

Action plan – *mandatory*

What recommended steps should we take to improve the policy or procedure and monitor its equality impact?

Capture any action we plan to take to reduce negative impacts and maximise positive impacts. The policy owner should prioritise actions based on their expected impact on helping us deliver the general equality duty and their contribution to our equality outcomes. The EHRSG and People Development and Wellbeing Group can advise on this.

When developing the action plan, policy owners should consider how to maximise the positive impact of the policy or procedure on all people who share the protected characteristics, with the requirement to maximise the core

⁴ [Probable Suicides, National Records of Scotland, August 2024](#)

outcomes of the policy or procedure. Actions should be strategic and proportionate.

The action plan should also include ways of monitoring the ongoing impact of the policy or procedure.

Action	Responsibility	Timeline
Be clear on how confidentiality of this information will be secured through the completion of a DPIA and ensuring that clear guidance is available to all and training in place for all colleagues and line managers to attend.	Project group developing guidance	March 2025 - completed
Ensure that the guidance is very clear on the fact that this scheme is voluntary. If an employee chooses not to participate in the scheme, they can still have adjustments in place, however these would be agreed by managers and / or HR, where necessary, without the need for a passport. No one will be disadvantaged for choosing not to use the passport scheme.	Project group developing guidance	March 2025 - completed
Produce guidance that is clear for managers and employees on what the route is for requesting adjustments, and what the expectations are once they are agreed. It should be clear who is responsible for agreeing adjustments. Guidance should also cover what people can do if things don't go as they should.	Project group developing guidance	March 2025 - completed
Within the action plan section, there is the potential to link to the DEI strategy and our new equality outcomes around raising awareness and providing more training, particularly on disability.	DEI strategy development project group	April 2025

Action	Responsibility	Timeline
Produce and consult on the template for the passport that helps mitigate against concerns raised.		Consultation with people leads, PCS and equality network groups completed by January 2025.
To give consideration to:		
1. A 'sign-off' process for those who this is being shared with, to indicate they understand and agree their responsibilities around confidentiality.	A 'sign-off' section has been included with explicit reference to disciplinary procedures where confidentiality is not observed.	
2. Having a passport that focusses on the impact of the need for adjustments and not the cause . For example – stating that it has been agreed that the employee does not travel to sites more than a certain distance away, and not a list of symptoms that make it hard for them to travel.	Part 1H is available for sharing with others without any background information.	
3. Being clear on what comes under the legal responsibility of reasonable adjustments for employees with disabilities and what doesn't. Are we only recording those, or are we intending this to be used more widely – and if so, we should differentiate.	Part two of the form relates to formal adjustments and disabilities. Part one can be used by / for anyone.	
We need to consider how we will monitor the impact of the work – the volume of those using the passport and their practical lived experiences of using the scheme.	EHRSG	March 2026

Approval/Publication/Review

Date of approval by EHRSG	28 January 2025
Date of approval by Executive Team	31 March 2025
Date published on Audit Scotland website	2 April 2025
Action plan review date (annually or as agreed with EHRSG)	

