

Equality Impact Assessment

Date of the assessment

August 2024

Name of policy or procedure

Career Development Gateway (CDG)

What does this policy or procedure aim to achieve?

Purpose and background

CDG is one of a range of opportunities for colleagues to progress their career. It is available to colleagues in Band 1 (zones A and B), and in Band 2 (zone A) and is designed to allow them to take an element of control of their career. Our People Strategy committed to a review of CDG, to be completed by 31 December 2024. This EIA considers the potential impact of removing CDG.

CDG was introduced in December 2017 as part of the Building a Better organisation (BaBo) project. CDG was co-created with colleagues from across the organisation, and through engagement with our Public and Commercial Services union (PCS) partners. CDG was equality impact assessed by an external consultant in February 2018. Where relevant we have included the findings from the 2018 EIA in this EIA.

BaBO sought to radically change how we worked and included changing our organisation structure, job profiles and making lasting improvements to employee reward, development and wellbeing. At the time, it became clear through consultation with colleagues and managers that a more flexible career progression model was required, both horizontally and vertically. The core aims and aspirations of BaBO were: increasing our organisational resilience, agility and collective ability to respond to the changing world of public audit; helping to harness and deploy the full potential of our people to ensure that we continue to deliver effective and efficient audit across Scotland's public sector; giving our colleagues greater autonomy, purpose and mastery in their work through a fresh approach to job design; and ensuring employee reward is simple, fair and supportive of our goals, helping enable us to recruit and retain great people and promote One Organisation flexible working.

The benefits of CDG have been conveyed as: opportunities for development and progression, empowerment, retention, and maximising the potential and ambition of colleagues.

The CDG process is linked to 3D (our internal employee and development appraisal process), where the individual can indicate a desire to progress their career by making a CDG submission. Together with their line manager they will consider the three CDG requirements: readiness, work availability and affordability. Individuals can also make a submission without their line manager's approval. CDG is designed to empower individuals to take control of their own career progression. Where a line manager is not sighted on the submission, once the submission is made to L&D, the business group Director with people lead responsibility is advised of the submission to assess the work availability and budget.

The submission is then provided to L&D and a panel convenes to consider the evidence provided. Panel members receive training to ensure that their assessment is fair and robust. The formal training is similar to our recruitment and selection training.

Regardless of whether the submission is successful or not, the member of staff will receive a development report that details their areas of strength, development areas, and follow-up actions.

Context for this EIA

The CDG SharePoint site states that “we continually review how CDG is working and its impact on our organisational priorities”, and in our people strategy 2023-28 we set out an action to review our internal Career Development Gateway (CDG) process. This review is due to be completed by December 2024 and the strategy notes the review will be undertaken in partnership with PCS Union.

In June and July 2024 Executive Team considered papers to agree an approach and next steps for the review of CDG. ET is proposing to consider withdrawing the CDG process, subject to a range of next steps and discussions. One of these next steps was to undertake an equality impact assessment on the decision to withdraw the process. This EIA considers the equality impact of this decision.

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.

General evidence considered

Audit Scotland’s overall approach to colleague development and career progression includes a package of activities, which are monitored through our routine HR and equality monitoring processes. These are set out in Table 1. Due to the low numbers overall, it is often not possible to breakdown this data by protected characteristic.

Table 1: Patterns of access to development opportunities 2020/21 to 2023/24

Development opportunity	2020/21	2021/22	2022/23	2023/24
CDG	15*	5	6	2
Acting up / additional responsibility allowance	10	11	19	12
Promotions	31	31	48	37
Training events	90	182	147	210
Training attendances	1387	2343	4100	3897
Number of projects advertised on the Opportunities Board	N/A	N/A	N/A	4

*The spike in successful CDG transitions in 2020/21 was due to ASG running a specific campaign to recruit people to Band 2B posts, which they delivered as a CDG opportunity rather than recruitment.

We also gather feedback on employee development through our annual engagement surveys. Overall, the findings from these in relation to employee development is positive. The Best Company rating for personal growth has been positive and scored above 4.7 in the last three surveys.

Some employees comment that there needs to be 'more clarity around career progression' at Audit Scotland with employees left unsure on what is available to them, and how they can reach their goals. There needs to be 'clear signposting to what training and development' is available to those that want to progress with the organisation so that individuals can see the 'pathway for career progression'.

PCS ran a member's survey in July 2021, which had responses from 77 members. Results highlighted concerns over how well the CDG process works, transparency, fairness, whether those successful were being held accountable in their new role, the length of the process, and lack of guidance. 87% of those 77 felt that CDG should be reviewed and that where career and/or project opportunities were available, it should be open to everyone to apply.

Overall findings

Where evidence-based opportunities for development and progression are provided to colleagues they should reduce the risk of discrimination. Objectivity in decision making processes is essential to ensure fairness and avoid the risk of unconscious bias.

Where more subjective processes are used, including those that rely on individual relationships and engagement, there is a risk some individuals may experience vulnerability to being treated differently, including due to a protected characteristic.

Withdrawing CDG has the potential to negatively affect some groups of staff, including leading to risks of discrimination and equality of opportunity if the development and progression activities that remain:

- do not provide enough flexibility to be tailored for the needs of people who share different protected characteristics
- do not adequately control for the potential subjective treatment of colleagues, due to individual circumstances and needs, including protected characteristics.
- do not allow some individuals or groups access to participate as easily as others.

A well-designed approach to colleague development and career progression, with a range of fairly administered, open and transparent opportunities, has the potential to help to eliminate discrimination and advance equality of opportunity by ensuring a robust and consistent approach to colleague development. This also has the potential to help foster good relations between groups of staff through a sense of fairness and consistency, and through building understanding and awareness of the needs of diverse groups of staff.

Potential negative impacts can be mitigated by:

- Clear processes and guidance around more subjective opportunities, such as acting up and additional responsibility allowances.
- Increased communication and flexibility within our recruitment processes to accommodate specific needs people have due to protected characteristics.
- Additional training for colleagues involved in recruitment on the importance of objectivity and identifying and removing bias from recruitment processes.

- Monitoring ongoing access to development and progression, following the removal of CDG, to understand any changes in the way people access these, to understand the effectiveness of mitigating actions and identify any further action required.
- Completing the role profile review project to ensure all colleagues have an up-to-date role profile that sets out clearly their responsibilities and the knowledge and experience required for their role.
- Delivering the integrated operational planning process for 2025/26 to 2027/28 and developing our strategic workforce plan for that period, integrating our approach to succession planning.
- Improving our approach to employee performance appraisal and development and embedding learning pathways.
- Delivering ET reverse mentoring opportunities.
- Establishing a recruitment board to oversee all recruitment decisions, which will ensure opportunities for internal progression are considered in decision-making about whether to advertise opportunities internally or externally.

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
Age	<p>During the period 2020/21 to 2023/24 (four years), we received 29 CDG submissions. The largest percentage of submissions was from employees aged between 25-34 (41%). A further 34% of submissions came from employees aged 35-44. It is noted that this is to be expected, given the stage of career of staff in this age profile.</p> <p>Total number of CDG submissions 2020/21-2023/24:</p> <ul style="list-style-type: none"> • Ages 25 to 34: 12 • Ages 35 to 44: 10 • Ages 45 to 54: 6 • Ages 55 to 64: 1 • All: 29 	<p>Withdrawing CDG has potential positive and negative impacts for different age groups.</p> <p>While our data shows that colleagues aged 34 and under are benefiting most from career progression through CDG, more openness, transparency and consistency around development and progression opportunities will benefit everyone.</p>
Disability	<p>In 2023 6.2 per cent of staff considered themselves to have a disability¹</p>	<p>Withdrawing CDG could have a potential negative impact on disabled people or people with</p>

¹ [Annual diversity report 2022/23 \(audit.scot\)](#)

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
	<p>We do not report data on employee development based on disability due to the low numbers involved.</p> <p>The 2024 Disability Confident Survey, run by the Audit Scotland Disability Confident Working Group, found that while most respondents had found Audit Scotland’s recruitment (external and internal) to have been accessible, almost half of the respondents felt that there were barriers to promotion with Audit Scotland due to their disability. These barriers included the anticipated impact on work-life balance, with perception that some senior roles are not compatible with the flexibility needed to manage the impact of an individual’s disability, the impact of an individual’s disability can make it difficult to maintain performance meaning that promotion is not realistic, and a lack of senior level role models.</p>	<p>neurodiverse conditions who may feel more comfortable with the CDG process than a competitive recruitment process. For example, because the CDG process is colleague led, staff can decide the format of their portfolio of evidence. This means someone who has anxiety about presentations can choose not to do a presentation. Or someone may have a learning difference which affects their written work and can opt to use verbal evidence.</p> <p>We have recently reviewed our recruitment policy and processes to ensure we proactively offer opportunities to highlight reasonable adjustments required by disabled applicants and applicants with neurodiverse conditions. We now include statements on examples of adjustments on our website and in all adverts. We also state during the interview process that individuals can share any adjustments needed.</p> <p>More openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>
Gender reassignment	<p>We do not collect data on employee development based on gender reassignment.</p>	<p>We expect there to be a neutral impact of withdrawing CDG on people due to their gender reassignment status.</p> <p>More openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
Marriage and civil partnership	We do not report data on this due to the low numbers involved.	<p>We expect there to be a neutral impact of withdrawing CDG on people due to their marital status.</p> <p>More openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>
Pregnancy and maternity	<p>We do not report data on employee development based on pregnancy and maternity due to the low numbers involved.</p> <p>Research by the Equality and Human Rights Commission (EHRC) in 2016 showed that 77% of mothers had a negative or possibly discriminatory experience during pregnancy, maternity leave, and/or on return from maternity leave. 50% of mothers reported a negative experience with regards to career opportunities.</p> <p>CDG submissions are instigated by staff themselves, which assists them in controlling and pacing career progression. This means staff can choose the timing of application to suit their personal circumstances, which can be important for some protected groups (for example, someone who has recently returned from maternity leave).</p>	<p>Withdrawing CDG could have a potential negative impact on women returning from work after maternity leave who may need more flexibility around the timing of their planned career progression.</p> <p>While we can mitigate this risk by ensuring colleagues on maternity leave are aware of vacancies when they arise, this relies on line managers fulfilling this responsibility. The risk remains that women who are on maternity leave are not able to prioritise a competitive recruitment process.</p> <p>More openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>
Race	<p>In 2023 6.8 per cent of staff identified as BAME²</p> <p>In 2022/23, 10.42 per cent of all promoted staff were BAME which is higher than the overall staff composition³.</p> <p>External evidence suggests that in the UK BAME colleagues are in general less likely to receive top performance markings when compared to white peers, less likely to be identified as high</p>	<p>Withdrawing CDG could have a potential negative impact on minority ethnic employees due to the potential risk of discrimination within recruitment processes or other more subjective progression opportunities, however it is unclear whether this is the case, and more openness, transparency and consistency around development and progression</p>

² [Annual diversity report 2022/23 \(audit.scot\)](#)

³ [Annual diversity report 2022/23 \(audit.scot\)](#)

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
	potential, or put forward for management training opportunities. ⁴	opportunities generally is likely to benefit everyone.
Religion or belief	We do not report data on employee development based on religion or belief due to the low numbers involved.	<p>We expect there to be a neutral impact of withdrawing CDG on people due to their religion or belief.</p> <p>More openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>
Sex	<p>In 2023, 56.5 per cent of Audit Scotland staff were female. Female representation at senior level (Board, Executive Team, and Leadership Group) had improved but was still noted as an area for improvement to achieve better gender balance⁵.</p> <p>As reported in our annual diversity report for 2022/23⁶:</p> <ul style="list-style-type: none"> • a total of six employees transitioned through a career development gateway, of which five were female and one was male. • of the 48 permanent promotions made across Audit Scotland, 58.33 per cent were female and 41.67 per cent were male • of the 19 acting up / additional responsibility allowances, 63.2% were made to females and 36.7% were made to males. <p>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 2020/21⁷) and are more likely to have caring responsibilities (in</p>	<p>Withdrawing CDG could have a potential negative impact on females, however it is unclear if this is the case, and more openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>

⁴ [bitc-race-toolkit-diversityobjectivesperformanceappraisal-apr2019.pdf](#)

⁵ [Annual diversity report 2022/23 \(audit.scot\)](#)

⁶ [Annual diversity report 2022/23 \(audit.scot\)](#)

⁷ [Scotland's Labour Market: People, Places and Regions - Statistics from the Annual Population Survey 2020/21 - gov.scot \(www.gov.scot\)](#)

Protected characteristic	Please summarise the evidence you considered	What is the potential impact (positive, neutral and negative) on people who share the characteristic?
	<p>Scotland in 2022-23, 80 per cent of working age carers were female⁸). This may affect their real or perceived ability to engage in the same range of opportunities to support their performance and development (e.g. accessing training or corporate development opportunities).</p>	
<p>Sexual orientation</p>	<p>We do not report data on employee development based on sexual orientation.</p> <p>An LBG Survey published by the European Agency for Fundamental Rights in 2014 found that 19% of employed LGB people in the UK experienced discrimination while at work, including having experienced detrimental prospects with regards to developmental opportunities.</p>	<p>Withdrawing CDG could have a potential negative impact on employees due to their sexual orientation due to the potential risk of discrimination within recruitment processes or other more subjective progression opportunities, however it is unclear if this is the case, and more openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>
<p>Socio-economic disadvantage</p>	<p>At the time of completing the EIA, we do not collect data on employee development based on socio economic disadvantage.</p> <p>From March 2025 this data will be available in our diversity reporting.</p>	<p>Withdrawing CDG could have a potential negative impact on employees due to socio economic status due to the potential risk of discrimination within recruitment processes or other more subjective progression opportunities, however if it is not clear if this is the case, and more openness, transparency and consistency around development and progression opportunities generally is likely to benefit everyone.</p>

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

Given the equality risks identified and the commitment in our people strategy to undertake the CDG review in partnership with the PCS Union, we plan to invite the PCS Union and our

⁸ [Carers Census, Scotland, 2022-23 - gov.scot \(www.gov.scot\)](http://www.gov.scot)

employee diversity network groups to feedback on the findings of this EIA and provide their views on the equality impact of removing CDG.

How to support employees with neurodiverse conditions - Employee Benefits

- Recognises the legal duty employers have to make reasonable adjustments to support colleagues with a neurodiversity where this is recognised as a disability.
- Highlights the importance of employers understanding the needs of staff with a neurodivergence and the specific impacts it may have for that member individual.
- Advocates that employers must ensure they eliminate biases in promotion processes in order to foster a workplace that champions fairness for all employees.
- Suggest that employers consider how best to communicate personal or professional development opportunities, to ensure neurodivergent colleagues are not disadvantaged by such opportunities arising through networking or informal channels which may not accommodate their strengths.

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.

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 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
Finalise and communicate guidance on acting up and additional responsibility allowances.	HR team	By December 2024
Review our recruitment and selection training to ensure the embedded content around unconscious bias is adequate and consider further additional mandatory training for managers in this area.	HR team	By December 2024
Deliver planned actions related to developing disabled		TBC – To be agreed as part of DEI strategy development

Action	Responsibility	Timeline
<p>colleagues, to support future progression in new DEI strategy:</p> <ul style="list-style-type: none"> • Develop a programme of training around disability awareness and the policies and guidance we have in place to support colleagues with disabilities. This should include neurodiversity awareness, adjustments and support for colleagues. • Introduce and embed an employee passport scheme, providing appropriate guidance and training for all colleagues. 	<p>L&D team</p> <p>HR team</p>	
<p>Deliver planned actions related to developing colleagues from a minority ethnic background, to support future progression in new DEI strategy:</p> <ul style="list-style-type: none"> • Develop partnerships with organisations who can help us make improvements to recruitment training or provide support and advice for candidates both internally and externally. • Adapt recruitment training to reflect learning from organisations with specialist guidance. 	<p>HR team</p>	<p>TBC – To be agreed as part of DEI strategy development</p>
<p>Deliver planned actions related to developing female colleagues, to support future progression in new DEI strategy, including promoting the return from maternity support available - colleagues available at all bands to "mentor" or buddy those returning from a period of leave.</p>	<p>I&Q</p> <p>HR team</p>	<p>TBC – To be agreed as part of DEI strategy development</p>

Action	Responsibility	Timeline
As part of our equalities monitoring arrangements, continue to gather data on employee development, (promotions, acting up / additional responsibility allowances / access to L&D), broken down by protected characteristic where possible, to monitor and interrogate trends.	HR team	Annually – 31 March snapshot date.

Approval/ Publication/ Review

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