

EQUALITY MAINSTREAMING AND OUTCOME PROGRESS REPORT 2019



Contents

Foreword	3
Ro-ràdh.....	5
Introduction.....	7
About us	9
Section 1 - Mainstreaming equality.....	11
Section 2 - Our Equality Outcomes	19
Section 3 - Employee Information.....	26
Section 4 – Board Diversity and Succession Planning	33
Section 5 - Pay gaps and equal pay	35
Section 6 – Our Equal Pay Policy	45

Alternative languages and formats

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If you are a user of British Sign Language (BSL) the Contact Scotland BSL service gives you access to an online interpreter enabling you to communicate with us using sign language.

Foreword

In February 2015, before I took up the role of the Scottish Environment Protection Agency (SEPA) Chief Executive, my predecessor kindly organised a two day visit to SEPA's Stirling office to help me learn about the organisation and meet some of my new colleagues. One of the first people I bumped into was SEPA's Equalities & Diversity Officer. I was delighted to find that the organisation had recognised that it needed this specialist expertise to help it rise to the challenge of mainstreaming equality into all it does.

I quickly learned that we were, indeed, not viewing this as a 'compliance obligation' to meet minimum statutory standards. Instead, we understood that mainstreaming equalities thinking into everything we do will:

- ensure we treat everyone we interact with in a way that we would all expect to be treated;
- strengthen the quality of the way we deliver our services.

This mirrors what we see every day with the businesses we regulate. Those who view the environment simply as a compliance obligation will meet minimum standards, but that's all. Those that see environmental excellence as an imperative will deliver much better environmental performance and much stronger commercial performance. The former group treat the environment as a sideline issue; the latter group mainstream environmental management into the core of their business.

This is what we are trying to do with the equalities agenda. We are trying to mainstream it into everything we do. We are trying to build it into our 'organisational DNA'. As we try to do this, what did we achieve this year?

In the way we deliver our services, social benefit is one of the three elements of our Statutory Purpose and it is built into our two core services:

- Regulation: Built into the ambition in our sector plans and a key deliverable in the new partnerships we're developing.
- Flooding: Social deprivation is an important consideration when we assess flood risk; we're working to make our flood warnings and information accessible to everyone.

Internally, we've worked hard to diversify our workforce, in particular by increasing the number of young people in SEPA and getting more women into leadership roles:

- over the last two years the number of SEPA staff under 25 has risen from 13 to 16
- the number of women in leadership roles has risen from 37.9% to 41.1%
- our gender pay gap has continued to fall and remains significantly lower than the Scottish and UK averages
- we are continuing to increase the number of staff who are disclosing equality monitoring information by making them aware why it is important and what we will do with it.

We are proud of these and other achievements, but know we need to do much more. We look forward to working in partnership with others and, as you read this report, we would welcome any suggestions about where we can improve and how we can accelerate and strengthen our progress.



Terry A'Hearn, Chief Executive Officer



Bob Downes, SEPA Agency Board Chair

Ro-ràdh

Annas a' Ghearran 2015, mus do thòisich mi san dreuchd mar Àrd-oifigear Buidheann Dìon Àrainneachd na h-Alba (SEPA), bha an neach san dreuchd romham cho còir agus cuairt a chur air dòigh thar dà latha gu oifis SEPA ann an Sruighlea airson mo chuideachadh ann a bhith ag ionnsachadh mun bhuidheann agus gus am b' urrainn dhomh coinneachadh ri cuid de na co-obraichean ùra agam. B' e aon de na daoine ris an do thachair mi aig fìor thoiseach ghnothaichean Oifigear Co-ionannachd is Iomadachd SEPA. Bha mi air mo dhòigh faighinn a-mach gun robh am buidheann air aithneachadh gun robh e feumach air an teòmachd speisealaichte seo gus a chuideachadh ann a bhith a' freagairt an dùbhlain agus co-ionannachd àbhaisteachadh ann an gach gnòthach a ghabhas e os làimh.

Fhuair mi a-mach gu luath nach robh sinn, gu dearbh, a' coimhead air seo mar 'comain ghèillidh' gus freagairt air na bun-tomhasan nàiseanta as lugha. An àite sin, thuig sinn gum bi a' bhuidh a leanas ann an àbhaisteachadh smaoineachadh air co-ionannachd anns gach rud a nì sinn:

- gun dèan sinn cinnteach gun làimhsich sinn gach duine ris an dèan sinn co-luadar mar a bhite an dùil gun làimhsichear sinn fhèin;
- gun neartaich sinn mathas dòigh lìbhrigidh nan seirbheisean againn.

Tha seo mar-aon leis na chì sinn gach latha anns na gnòthachasan a bhios sinn a' riaghailteachadh. Bidh an fheadhainn a tha a' coimhead air an àrainneachd mar comain ghèillidh a' freagairt air na bun-tomhasan as lugha, ach sin uile. Bidh an fheadhainn a tha a' measadh sàr-mhathas àrainneachdail mar rud riatanach a' dèanamh fada nas fheàrr ann an coileanadh àrainneachdail agus bidh coileanadh malairteachd fada nas treasa aca. Tha an dàrna cuid a' cur cùise na h-àrainneachd gus an oir; tha a' chuid eile ag àbhaisteachadh stiùireadh àrainneachd ann an cridhe an gnòthachais.

'S e seo a tha sinne a' feuchainn ri dèanamh le rùn nan co-ionannachd. Tha sinn a' feuchainn ri àbhaisteachadh anns gach rud a nì sinn. Tha sinn a' feuchainn ri fhisge a-steach ann an 'DNA a' bhuidhinn' againn. Fhad 's a tha sinn a' feuchainn ri seo a dhèanamh, dè choilean sinn am-bliadhna?

San dòigh anns am bi sinn a' lìbhrigeadh ar seirbheisean, 's e sochair shòisealta aon de na trì feartan san Adhbhar Reachdail againn agus tha e air fhilleadh a-steach san dà prìomh sheirbheis againn:

- Riaghailteachadh: Stèidhte sna miannan nar planaichean roinneil agus prìomh rud ri lìbhrigeadh sna com-pàirteachasan ùra a tha sinn a' leasachadh.
- Tuileachadh: Tha easbhaidh shòisealta na cùis bheachdachaidh nuair a mheasas sinn cunnart tuileachaidh; tha sinn ag obair gus na rabhaidhean tuil agus am fiosrachadh fhàgail so-ruigsinneach don a h-uile duine.

Am broinn a' bhuidhinn, tha sinn air obair gu cruaidh gus ar feachd-obrach a dhèanamh eag-samhlach, gu h-àraidh le bhith a' meudachadh àireamh nan daoine òga ann an SEPA agus a' suidheachadh barrachd bhoireannach ann an dreuchdan ceannardais:

- thairis air an dà bhliadhna mu dheireadh tha àireamh an luchd-obrach SEPA fo aois 25 air àrdachadh bho 13 gu 16
- tha an àireamh de bhoireannaich ann an dreuchdan ceannardais air àrdachadh bho 37.9% gu 41.1%
- tha ar beàrn thuarastail a rèir gnè air leantainn oirre a' tuiteam agus tha i fhathast gu math nas ìsle na an cuibheas ann an Alba agus san RA
- tha sinn a' leantainn oirnn a' meudachadh àireamh an luchd-obrach a tha a' foillseachadh fiosrachadh sgrùdaidh co-ionannachd le bhith a' leigeil fios dhaibh carson a tha e cudromach agus dè nì sinn leis.

Tha sinn moiteil às na coileanaidhean seo agus eile, ach tha fios againn gum feum sinn tòrr a bharrachd a dhèanamh. Tha fadachd oirnn ri bhith ag obair an com-pàirteachas le feadhainn eile, agus, mar a leughas sibh an aithisg seo, chuireamaid fàilte air molaidhean sam bith air far an urrainn dhuinn a dhol am feabhas agus mar as urrainn dhuinn ar n-adhartas a luathachadh is a neartachadh.



Terry A'Hearn, Àrd-oifigear



Bob Downes, SEPA Cathraiche Bòrd Buidheann SEPA

Introduction

This is our third progress report explaining how we are meeting our [Public Sector Equality Duty](#) set out in [The Equality Act 2010](#). This report covers the period 2017-2019.

In this report we are presenting all our work on equality and human rights in one place to demonstrate to our staff and stakeholders the progress we have made mainstreaming equality. By integrating equality into the services we deliver and the way we run our organisation, we are contributing to the Scottish Government's national outcome: We respect, protect and fulfil human rights and live free from discrimination.

We are also contributing to these United Nations Sustainable Development Goals:

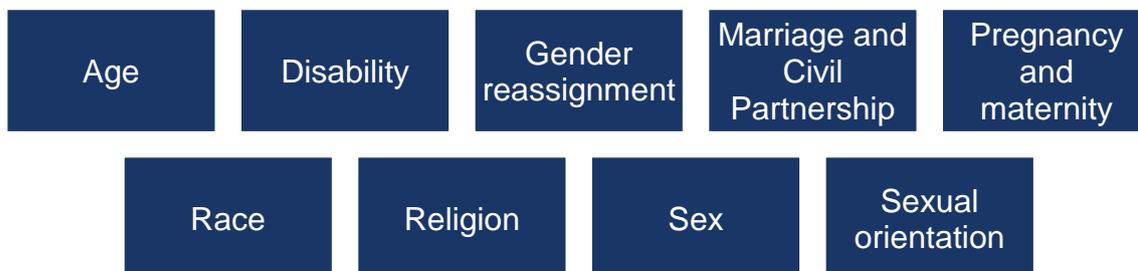


There are two parts to the Public Sector Equality Duty: the General Equality Duty and Scottish Specific Duties.

Under the General Equality Duty, we must:

- eliminate unlawful [discrimination, harassment and victimisation](#) and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not;
- foster good relations between people who share a [protected characteristic](#) and those who do not.

The nine protected characteristics are:



The Scottish Specific Duties were introduced by [The Equality Act 2010 \(Specific Duties\) \(Scotland\) Regulations 2012](#), to help us deliver our General Equality Duty. This report has been structured to show how we are meeting the Scottish Specific Duties, as listed below.

Section 1

- Report on mainstreaming the equality duty
- Assess and review policies and practices
- Consider award criteria and conditions in relation to public procurement
- Publish in a manner that is accessible
- Make reasonable adjustments

Section 2

- Publish equality outcomes and report progress

Section 3

- Gather and use employee information

Section 4

- Publish information on board diversity and succession planning

Section 5

- Publish gender pay gap information

Section 6

- Publish statements on equal pay

The Fairer Scotland Duty came into force in April 2018, to ensure that particular public sector bodies consider how they can reduce socio-economic disadvantage when making important decisions and report how they have achieved that. Although we do not have any responsibilities under this duty, achieving social benefit is a key part of our purpose and so have included examples of the work we have done to reduce socio-economic disadvantage in this report.

About us

We are Scotland's Environment Protection Agency and our Statutory Purpose is to protect and improve the environment in ways that, as far as possible, also help create health and well-being benefits and sustainable economic growth.



Protect and improve the environment

Environmental success

SEPA's Statutory Purpose



Help create health and well-being benefits

Social success

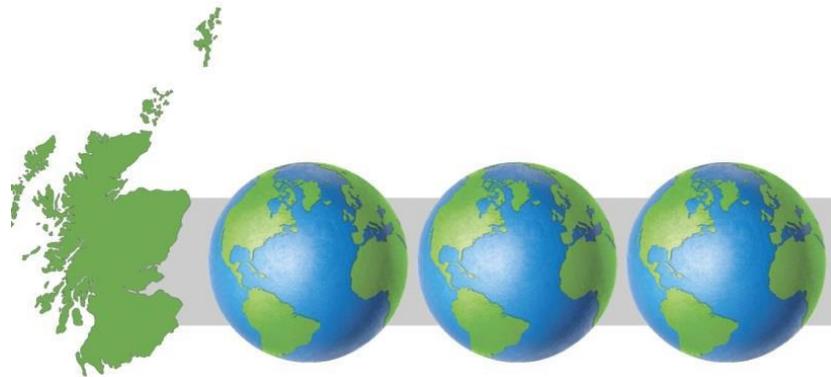


Help create sustainable economic growth

Economic success

Every day we work to protect and enhance Scotland's environment, helping communities and businesses thrive with the resources of our planet. We call this One Planet Prosperity.

We recognise that, as a society, we are over-using our planet's resources, and if everyone lived as we do in Scotland, we would need three planets to sustain ourselves. In the 21st century, only those businesses, societies and nations which have developed ways to prosper within the planet's regenerative capacity will thrive.



All the businesses that we regulate use water, energy and raw materials to produce the products and services they provide. In doing so, they also create waste and emissions that can harm the environment. As Scotland's environmental regulator, we are in a unique position to protect and enhance Scotland's environment, but also help communities and businesses thrive within the resources available.

We deliver two core services - regulation and flood risk management. [One Planet Prosperity - Our Regulatory Strategy](#) sets out how we tackle environmental crime support businesses in driving up compliance, and help those who want to go beyond compliance to reap the economic and social benefits of environmental excellence. As Scotland's authority for strategic flood risk management, we implement [Scotland's Flood Risk Management Strategies](#) with our partners, develop new flood warning schemes, and further improve our flood forecasting to help people and businesses protect themselves and their property. Our 1287 employees work out of 22 offices across Scotland from Lerwick in the North to Dumfries in the South.

Section 1 - Mainstreaming equality

Mainstreaming equality simply means integrating equality into all our day-to-day work. We employ a member of staff to coordinate our work to mainstream equality. In 2017, we decided to move that role from our Human Resources Team into our Business Strategy Team. This reflected our desire to align our equality work more to our organisational strategy and to strengthen our focus on mainstreaming equality into our core services: regulation and flooding. Over the last year we have recruited a new, permanent member of staff to be our lead on equality and human rights and a new solicitor whose remit includes providing advice on equality and human rights.

In 2017, we also commissioned an internal audit into the arrangements we have in place to mainstream equality throughout the organisation. We were pleased that the auditors found that our procedures reflect good practice. They also made useful suggestions to help us improve. One of these was to review all current equality processes and develop a clear and concise equality framework.

As we reviewed our approach to equality, we decided to reflect good practice by expanding it to include Human Rights. We set out our Equality and Human Rights framework in a handbook. Simplifying and clarifying our approach in this way has made it easier for us to plan and communicate our work. We are now using the handbook to drive forward actions to mainstream equality.

We are a member of the Non-Departmental Public Body Equality Forum. Our membership of the forum allows us to learn from and share good practice.

In the rest of this section we will explain the steps we are taking to deliver the [three parts](#) of the Public Sector Equality Duty.

How we are eliminating unlawful discrimination, harassment and victimisation

Awareness raising

We use an e-learning package called Equality Essentials to ensure that all employees understand their roles and responsibilities in relation to equality. Traditionally it has been very difficult for us to track who has completed this training. We have recently put a new training system in place which makes it much easier for us to monitor the completion of training programmes. We are working to ensure that every member of staff has completed the training course this year.

While reviewing our equality framework we completed a training needs analysis. We identified a number of areas where we would like to mainstream equality and human rights thinking into our existing training packages, rather than delivering stand-alone training sessions. Over the next year we will be working to achieve this.

Policies, procedures and guidance

We have a range of policies, procedures and guidance in place to promote equality and diversity in our workplace.

All our posts are graded using a job evaluation scheme to ensure the grading is free from bias or discrimination. The scheme is operated with our recognised trade union, UNISON. As the scheme has been in place for a number of years, we have committed to review it this year.

We follow the Scottish Government's Pay Policy. This has prioritised protecting those on low pay through a progressive approach delivered through the application of tiered pay increases.

We provide a number of schemes which give staff flexibility to manage a good work-life balance whilst also meeting their work objectives. To promote our commitment to flexible working we advertise all our posts with the 'Happy to Talk Flexible Working' logo. Flexible options for staff include a flexi-time scheme, flexible working patterns including part-time or compressed hours, and flexible retirement.



We have over 20 office locations and in 2017 we asked staff to suggest ways we could make it easier for those who work in more remote offices to make a full contribution to delivering our ambitious strategy. They recommended that all our posts should be advertised as 'location flexible' unless there are strong business reasons why a post has to be based in a particular location. We have adopted that recommendation.

In 2018, we became a level two disability confident employer and advertise this on our recruitment website to encourage applications from people with disabilities. To achieve this accreditation we self-assess our approach in the following two areas: (i) getting the right people for our business and (ii) keeping and developing our people. We are currently working towards becoming a Disability Confident Leader and hope to achieve this over the next year.



We are proud to be one of Scotland's Living Wage Employers and we actively promote the scheme when we advertise posts.

We offer a free, confidential Employee Assistance Programme to all our staff. This service provides counselling, signposting and information to help staff with personal or work-related problems that may be affecting their health, wellbeing or performance. It is accessed either online or through a 24-hour Freephone service.

We have a range of Family Friendly policies and procedures to help staff plan and manage maternity, adoption and paternal leave.

Measuring our approach and learning from feedback

We need to be sure that the approaches we have in place are right for our employees and our customers. The equality monitoring data and information that we collect helps us understand that. Examples of the data we monitor and use include:

- equal pay between women and men; disabled and non-disabled people; people in a minority racial group and those who are not;
- gender pay gap;
- employee grievances and customer complaints;
- employee and customer surveys including exit surveys when employees leave;
- the characteristics of our leavers; our recruitment process; training and development; and our staff promotions.

At the moment we do not collect data relating to protected characteristics in relation to complaints, grievances or exit questionnaires. We will be reviewing whether or not that would be useful this year.

We have carried out a staff survey every two years since 2009. In 2017, the survey showed that there is a positive trend in staff views about working for SEPA and on fairness and equality in SEPA. 87% of staff agreed that SEPA is an equal opportunity employer with 79% saying that they are able to strike the right balance between work and home life. However, 13% of staff indicated that they have experienced bullying and harassment, and a majority of those who reported it expressed dissatisfaction with how it was handled.

We are committed to promoting dignity and fairness in the workplace and we take these findings very seriously. As such, further analysis was carried out to improve our understanding of the survey results. Meetings with all management teams were facilitated to discuss the results and agree actions for their respective areas. A questionnaire was sent to every team asking them to discuss the survey results as a team and agree actions for themselves. A Staff Ideas Group on "Encouraging positive behaviours at work" was created, and 69 volunteers took part in four workshops across SEPA. The group presented its results to the Agency Management Team in December 2018 and a number of actions were agreed.

How we are advancing equality of opportunity between people who share a relevant protected characteristic and those that do not

Staff ideas groups

We want to make the most of the skills, experience and ideas of all of our staff, to help us make the best decisions. We have set up Staff Ideas Groups to make it easy for all staff to contribute their views on how we develop as an organisation. Everyone is encouraged to volunteer for the groups and membership is deliberately diverse and spans across portfolios, geographic location, gender, pay bands and age.

Groups consider specific areas of our work and provide input that helps the management team make its decisions. Since 2017, Staff Ideas Groups have considered topics such as dispersed offices and inclusion; youth education and employability; enforcement undertakings; intelligence service delivery and sustainable growth agreements. Workshops have also been held to get staff input for the development of each of our sector plans. Again, we worked hard to ensure the workshops were diverse, encouraging a wide range of views to help us develop our plans.

Learning from lived experience

One way we can improve our decision-making is to learn from the lived experience of employees and customers. Following the EU Exit referendum, members of our staff who are EU citizens set up a support group to share experience and information. We recognise the value of this kind of network and we have decided to see if staff would welcome other employee networks based on any of the protected characteristics or other lived experience. This will be to support them and to use their lived experience to improve SEPA.

Equality and human rights impact assessments

Before introducing new strategies, policies, systems or services, or making changes to existing ones, we need to assess the impact they will have on people. We then need to decide which adjustments to make to ensure that:

- all customers have the same experience when they access our services;
- all employees are able to succeed at their job.

We currently use an Equality Impact Assessment form to do this and publish the results on our [website](#). We are really keen to get the thinking captured through this process built into our actual plans and policies, rather than sitting in a separate document. We are working with our Sector Team to develop an easy way to do this and will be able to demonstrate the new approach in our next mainstreaming report in 2021.

Inclusive communication

We want to make sure that people with a disability, such as hearing or sight impairment, get information they can access and understand, and any communication support that they need. Our contact centre is set up to use the [Contact Scotland interpretation service](#). This is a Scottish Government service that connects us to deaf British Sign Language users throughout Scotland using an online interpreting video relay service.

We have taken some steps towards achieving the goals in the Scottish Government's National Action Plan on British Sign Language, but we want to go further. We are committed to signing up to the British Sign Language Charter, administered by the British Deaf Association. The Charter asks local authorities and public services across the UK to sign up and make [five pledges](#) to improve access and rights for Deaf British Sign Language users. We will be working on these over the next year.

We have signed up to the [Scottish Government's Translation and Interpretation Framework](#) to provide support for those service users who need documents in other languages or the use of a face-to-face interpreter.

Almost every Equality Impact Assessment we complete highlights the need to make our communication and engagement inclusive. This means that many staff are considering how to achieve that, but we are approaching it in an ad-hoc way. We want to improve this, so this year we have committed to developing a corporate approach on inclusive communication and engagement.

Science, Technology, Engineering, Mathematics and Medicine Ambassadors

We currently have 15 STEMM Ambassadors among our staff. They work with schools and



education providers to encourage children, particularly girls, to take an interest in science, technology, engineering, mathematics and medicine, with a particular focus on the environment.

How we are fostering good relations between people who share a protected characteristic and those who do not

Fostering good relations means tackling prejudice and promoting understanding between people from communities that have protected characteristics and those that do not. Through our work, we have many opportunities to influence others, identify areas where human rights might be being breached and to foster good relations between different communities. Here are examples of some of the areas we are currently focusing on.

The United Nations' 17 Sustainable Development Goals

Scotland was one of the first countries to adopt the global targets of the [United Nations' 17 Sustainable Development Goals](#). These are a universal call to action for all countries to tackle poverty and inequality, protect the planet and ensure peace, prosperity and justice for all. We have collaborated with the Institute of Chartered Accountants of Scotland to help businesses think about integrating their Sustainable Development Goals into their day-to-day work. Businesses have a critical role to play in leading Scotland's contribution to achieving the goals. Our vision is to translate the goals into practical, hands-on tools and approaches that can be used in the day-to-day work of businesses to benefit them, local communities and the environment.

Sustainable Growth Agreements

One of the tools we have for helping businesses go beyond compliance are Sustainable Growth Agreements. These are voluntary, formal agreements SEPA makes with individual organisations. They focus on practical action to deliver environmental outcomes and help achieve [One Planet Prosperity](#). Our guidance encourages businesses to look for opportunities to promote social outcomes and to adopt the [Scottish Business Pledge](#). Through these agreements, we can help organisations collaborate with experts, innovators and stakeholders on different approaches that could improve environmental performance while also helping create commercial and social success.



A recent example is the [Sustainable Growth Agreement](#) we signed with Scottish Water in 2018 focused on finding new ways to recover more resources from the wastes Scottish Water manages and generates. The agreement aims to contribute to ten of the UN Sustainable Development Goals.

This photograph shows Douglas Millican, Chief Executive of Scottish Water, Roseanna Cunningham, Cabinet Secretary for Environment, Climate Change and Land Reform, and Terry A'Hearn, our Chief Executive, at the launch of the agreement.

Vacant and derelict land



We are working with The Scottish Land Commission in an [innovative partnership](#) to transform how vacant and derelict land is dealt with. Supporting local authorities to rejuvenate vacant and derelict land brings about long-term regeneration and renewal – unlocking growth, reviving communities, increasing community empowerment, reducing inequalities and inspiring local pride.

This photograph shows Jo Green, Chief Officer, SEPA, Roseanna Cunningham, Cabinet Secretary for Environment, Climate Change and Land Reform and Hamish Trench, Chief Executive of the Scottish Land Commission, at the launch of the partnership.

River Leven

We are working with partners on a new approach to managing the catchment area of the River Leven in Fife. Instead of just tackling the environmental problems, our new approach recognises the river as a great regional asset and seeks to maximise the cultural, economic and social opportunities available.

The Connectivity Project is an example of this work. It focuses on a 5km stretch of the river at Levenmouth, one of the most deprived areas in mid-Fife. The community there is disconnected not just from the environment, but also from good public transport infrastructure and economic opportunities. The Connectivity Project will deliver river improvements, develop a series of paths to connect the communities to and along the river and unlock opportunities on the vacant and derelict land. It is hoped that by working with the community to capitalise on these opportunities, the area will be opened up to new economic, health and well-being opportunities.

Human trafficking

As demonstrated in Scottish Government [research and policy](#), human trafficking in Scotland involves the trafficking of people for employment in businesses like nail bars, car washes, construction, agriculture, fishing and hospitality. We know that people from Vietnam, Romania, Ghana, Sri Lanka, Philippines, Iraq and Syria have been targeted for this purpose and we are also aware of exploitation of labour within the travelling community. We are raising awareness of human trafficking to enable our staff to look out for signs of it while they are visiting businesses as part of our regulatory activity and report any suspicions they have. We are working in partnership with Police Scotland to provide e-learning for our staff.

Supporting water resource management in Malawi

We have embarked on [a programme of work](#) to assist the Government of Malawi to set up the National Water Resources Authority. By helping them to address water quality and

scarcity issues and meet the food security, nutrition and environmental needs of the country's rapidly growing population, we are helping to tackle inequality on a global scale. Providing peer to peer support is at the core of our partnership with the Authority, helping them gain the capacity to regulate their water resources - ensuring they are managed in a way which protects the environment while realising the social and economic benefits that come with good water stewardship.

Procurement

When we are assessing tenders we include equality considerations as part of our mandatory 10% sustainability criteria score. One of the objectives in our Procurement Strategy (2016-2022) is to improve the sustainability evaluation undertaken when awarding contracts and managing contracts. For contracts over £4m we will identify community benefit criteria that are proportionate to the contract being tendered. This will be evaluated as part of the mandatory 10% sustainability score."

Volunteering

We encourage each member of staff to take one day's paid leave to carry out volunteering activity. This allows employees to develop new skills, build important partnerships between charities and the public sector and help break down barriers between different sections of society.

Reasonable adjustments and disability

We want to make our workplaces and services as accessible and inclusive as possible. Our managers work with staff members to understand where specialised equipment, or other reasonable adjustments, will help support them at work. We have a small supportive equipment lending scheme, so that staff can try more commonly recommended supports (such as different computer mice and keyboards) for suitability before the item is purchased. This helps to ensure that the most suitable equipment is ordered.

We have carried out access audits on all of our properties and drawn up a list of key improvements planned to be completed on a priority basis. While larger capital projects tend to wait until we are completing a major refurbishment, accessibility continues to be a key consideration when assessing properties to lease. We are addressing a significant access issue at the entrance to our corporate office in Stirling. We will soon install a new accessible entry system complete with the back-up of an intercom facility mounted on a post outside the main door.

In 2017, we met with Dyslexia Scotland to gain a better understanding of the difficulties people with dyslexia face when applying for a post. This helped us understand the reasonable adjustments we need to make, such as allowing additional time in interviews and tests.

Section 2 - Our Equality Outcomes

One of our Scottish Specific Duties is to publish equality outcomes which help us mainstream equality through our work, and report progress every two years. In this section we report our progress towards achieving the two equality outcomes we published in 2017:

1. SEPA's performance is enhanced by having a workforce whose diversity more closely reflects that of Scotland
2. The people of Scotland, including those hard to reach and minority communities, can readily access, understand and are enabled to act upon SEPA services

We have decided to retain these outcomes for another two years as they still reflect our ambition. However, we have made a small change to the wording of our second outcome. We have removed the reference to 'hard to reach' communities because we recognise that providing services in different ways to different communities does not make any community 'hard to reach'. Our second equality outcome is now:

The people of Scotland, including minority communities, can readily access, understand and are enabled to act upon SEPA services.

Equality Outcome 1: SEPA's performance is enhanced by having a workforce whose diversity more closely reflects that of Scotland

We have an ambitious strategy and we want to retain, recruit, and develop the most talented people who have the skills and approach to help us achieve it. We collect and analyse employee information to help us understand where our workforce is not diverse. The employee information we that we used to decide how to achieve this outcome is included in [Section 3](#) of this report.

In 2017, we were concerned that only 13 of our employees were in the 16-24 age bracket. We also realised that female employees were under-represented in leadership positions. Only 37.9% of our senior managers were female¹. In this section we explain some of the changes we have made to our recruitment and employment practices to encourage a more diverse workforce.

When we reviewed our [employee information](#) on 30 November 2018 we were encouraged to see that the numbers are moving in the right direction. We had 16 employees in the 16-24 age bracket and 41.1% of senior managers were female. However, there is still work to be done in both of these areas and we will continue to address them.

¹ We define a senior manager as someone who is employed at Grade Y, A or B.

Understanding the diversity of our workforce

We collect information from our staff to let us know how diverse our workforce is. We have been collecting this information for a number of years and over time the rate of non-disclosure has been reducing. This means that we have a better understanding of the diversity of our staff.

The following table shows the percentage of staff who preferred not to disclose information relating to a particular characteristic each year. We have improved our monitoring information by continuing to explain the value and purpose of collecting equality data to our staff through articles in our staff bulletins and ad-hoc communications.

Non-disclosure of staff personal information relating to a protected characteristic

	2013	2015	2017	2019
Age	0.0%	0.0%	0.0%	0.0%
Disability	5.4%	4.3%	4.1%	4.1%
Marriage and civil partnership	6.7%	5.7%	5.3%	5.3%
Race	8.4%	7.4%	6.8%	6.2%
Religion or Belief	24.0%	21.1%	21.1%	19.4%
Sex	0.0%	0.0%	0.0%	0.0%
Sexual Orientation	20.7%	18.7%	17.6%	17.1%

Our Human Resources system currently holds information about seven of the protected characteristics. In addition to this, we collect information on pregnancy and maternity through our maternity, paternity and shared parental leave processes. We do not yet collect information about gender re-assignment but we are exploring ways of building this into our system.

Recruiting a more diverse workforce

We want to make sure that our recruitment activities are fair and inclusive, and reasonable adjustments are made to help those who need them. As we have re-structured over the last couple of years, we have been keen to encourage more women to join our leadership team and more young people to join the organisation. We have made improvements, both to the way we advertise our jobs and the way we assess candidates. As a result, the number of applications we receive from young people has increased.

We have made sure more young people are aware of the positions available to them by:

- advertising our jobs more widely, including on social media. We used a Facebook campaign to advertise our 2017 Graduate Recruitment Scheme which received 633 applications for 9 positions;

- posting vacancies on websites targeted at apprentices;
- advertising on partners' websites including Skills Development Scotland.

The percentage of applicants in different age groups applying for our vacancies each year

Age group	2016	2017²	2018
16-19	0.5%	0.3%	2.9%
20-29	24.9%	37.1%	33.5%

We have also made changes to the way we assess candidates, particularly in our senior roles, to ensure we get the skills and diversity we need. The changes we have made include:

- creating job descriptions for our new roles which focus on the leadership and management skills we need, rather than technical skills.
- selection panels consist of at least three experienced members, have a gender balance and include people from different parts of the organisation.
- we use a wide selection of tools to help with recruitment rather than focusing solely on an interview. These include assessment centres, in-tray exercises, psychometric tests and other assessments.
- all vacancies are advertised with the “Happy to Talk Flexible Working” strapline which means managers will consider a request from the successful candidate to work flexibly.

Graduate Recruitment Scheme

We wanted to make our workforce more diverse and benefit from the enthusiasm and fresh-thinking brought by talented, recent graduates. We launched our first two-year scheme in 2017 recruiting nine graduates. The graduates gain a broad understanding of SEPA by spending time in different areas of the business, and their feedback has been very positive. We are recruiting a second set of graduates to the scheme in 2019.

Modern Apprenticeships

Modern Apprenticeships allow young people to get work experience while also working towards a qualification. Since 2017 we have employed six modern apprentices in office administration; systems testing; information services and cyber security. We are now assessing opportunities to introduce apprentices to other parts of the organisation.

² We recruited to our graduate scheme this year, and received a high number of applications specifically for that scheme.

Foundation Apprenticeships

In our [Social Impact Pledge](#) we made a commitment to engage with schools and inspire pupils to excel. One way we are doing this is through the Foundation Apprentice programme. We have provided work placements for seven Foundation Apprentices since 2017. The students come to SEPA for work experience one day per week for eight months. As well as mentoring them to help them deliver work for us, we support them with their course work, help them develop interview skills and provided employability and health and safety training.

Equality Outcome 2: The people of Scotland, including minority communities, can readily access, understand and are enabled to act upon SEPA services³

Regulation

In our role as Scotland's environmental regulator, we work collaboratively with businesses to reduce water use, carbon-based energy use, materials use and all forms of waste and pollution. To make sure all business are compliant with environmental regulations and to help as many as possible go beyond compliance, we are changing the way we organise our work. Instead of regulating individual sites, we are grounding our regulation in working across whole sectors. In this way we can systematically identify the compliance issues that need to be tackled by the sector as well as the opportunities to move beyond compliance.

We are in the process of developing a sector plan for each sector we regulate, which includes commitments to:

- create environmental success in ways that, as far as possible, also create social and economic success;
- include social issues such as recognising the importance of creating local jobs in rural communities and any issues that non-compliance is creating in the communities the sector is operating in;
- understand the social and economic drivers that motivate the sector;
- help us identify any groups that are disadvantaged by our current practices and enable us to meet their needs more effectively;
- foster good relationships with sectors and allow us to work more collaboratively with them.

Since 2017 we have developed sector plans for 16 of the sectors we regulate and we will have the rest in place by 2021.

³ Our two core services are regulation and flooding

Communication and engagement

Our work will only be successful if we can communicate effectively, whether in relation to flooding advice, environmental regulation or keeping staff informed. We know that the language we use, the methods of communication we adopt and the reach of that communication are all important. In the past we have used too much jargon and technical language and we are simplifying our communications. In 2018, we developed a new communications strategy which includes commitments that our communications will be:

- Clear and concise: using plain English, rather than corporate speak, to crisply convey information.
- Accessible and reflect our diverse society: multi-format, multi-channel communication reflecting diversity.

A particular focus for us is simplifying our permits for our customers. If we want people to meet their environmental obligations, they need to understand what the regulations are and why they are important. By simplifying environmental permits we will be making it easier for all our regulated customers to understand their environmental responsibilities.

Sector plans and simplified permits make our services more accessible for all our customers. Where necessary we also tailor our approach to the needs of specific groups. The following examples show how we have ensured that waste hauliers who don't have English as their first language were aware of their responsibilities and how we have been raising awareness about the importance of tackling food waste with the Scottish Muslim community and other black and minority ethnic communities.

In 2018, we targeted the haulage industry with a '*Drive out waste crime*' awareness-raising campaign. Our intelligence indicated that Polish, Romanian and Lithuanian nationals operating within the UK haulage industry would benefit from greater awareness of their waste Duty of Care obligations. We produced campaign materials in [English](#); [Polish](#); [Romanian](#); and [Lithuanian](#) and distributed them at road stops, by mail to registered waste carriers and online.

Building upon previous work with Indian and Pakistani-owned restaurants in Glasgow, we held a workshop for black and minority ethnic restaurant owners at the Aberdeen Multicultural Centre in June 2017. The aim was to tackle food waste by making restaurant owners better informed about their responsibilities. The workshop helped us to identify particular challenges faced by these business owners that we can help address. We also helped religious communities understand SEPA's role and the impact of food waste through two broadcasts on radio stations in Glasgow in 2018. Radio Ramadhan is a Glasgow-based radio station aimed at the Scottish Muslim community. We were part of the Green Deen discussions on the station during Ramadhan. The discussion focused on

raising awareness of SEPA and in particular food and food waste. A further session was held on the radio station Awaz FM.

Flooding

One of our strategic outcomes is to reduce the impact of flooding. We are responsible for producing [Scotland's Flood Risk Management Strategies](#) which coordinate efforts to manage flood risk in Scotland. In 2011, we produced the first National Flood Risk Assessment for Scotland. We developed a Social Vulnerability Index for each neighbourhood in Scotland so that we could include social disadvantage in our assessment. The index used seven metrics: unemployment, overcrowding, non-car ownership, non-home ownership, long-term sick, single parents and the elderly.

In 2015, the Scottish Government published a full report on Mapping Flood Disadvantage in Scotland. This used a much greater range of metrics to understand the scale of flood disadvantage. We used it to inform the latest National Flood Risk Assessment, published in December 2018. We placed a greater emphasis on the importance of understanding social impacts in this assessment. We also included an assessment of the impact of flooding on community facilities such as healthcare facilities, emergency services, education facilities, libraries and job centres. In future we want to have a better understanding of the impacts of flooding on mental health. This is a difficult area to measure but important to help us understand the true impact of flooding.

We are Scotland's flood warning authority. We give communities and emergency responders advance notice of flooding and help them to be prepared and protect themselves. We have used partnerships to widen our reach to better help those less likely or able to engage with us. With Citizens Advice Scotland, we have developed an e-learning package. This helps train advisors in Citizen Advice Bureaux on flood risk issues and how to help their more vulnerable clients access our services. We have combined forces with Scottish Government Community Resilience to encourage the take-up of the package.

We have continued our work with younger people, using better information resources and direct engagement. Examples include:

- Promoting flooding safety through Safer Communities events, reaching approximately 10,000 Primary 7 pupils per year in 2017 and 2018.
- Partnership with Education Scotland to develop and resource education professionals' understanding of flooding and resilience issues within the context of Scotland's Curriculum for Excellence.

We have set up a Flooding Products and Services User Group to ensure we review and develop our products and services with the people they will serve. We have also conducted

research with a range of customer groups to identify potential improvements to our flood warning service.

We are committed to create a Scottish Flood Forecast for the general public. Extensive customer research is an integral part of our approach. We are investigating what flood forecast information we can provide to the public, in the most accessible format. We have engaged with community and equality groups to identify barriers and solutions.

Section 3 - Employee Information

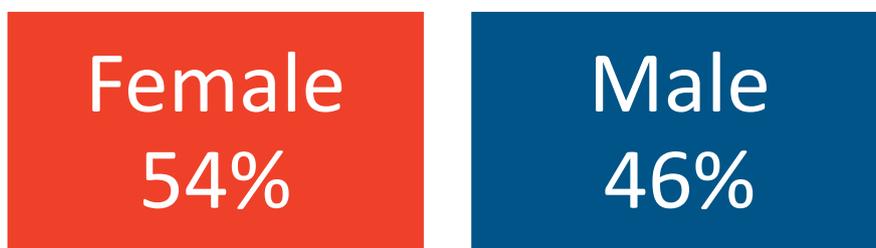
We have a statutory responsibility to monitor the protected characteristics of our workforce. This allows us to identify any gaps or issues in our recruitment and employment procedures. We recognise that our data is not comprehensive at the moment and we will improve and streamline the way we report data before the next Equality Mainstreaming Report.

In this section, we've included the employee information we used to inform the work we've done to achieve our outcome: "SEPA's performance is enhanced by having a workforce whose diversity more closely reflects that of Scotland". In addition to our workforce profile, we currently monitor the characteristics of our leavers, our recruitment process and our staff promotions.

We want to protect the confidentiality of individual members of staff. Where we have fewer than five employees in a category and we want to protect their identity, we have marked data that would identify them with an asterisk. This does not apply when the information is otherwise publically available through our website. 'Information not provided' means that a member of staff has not supplied this information.

Our workforce profile

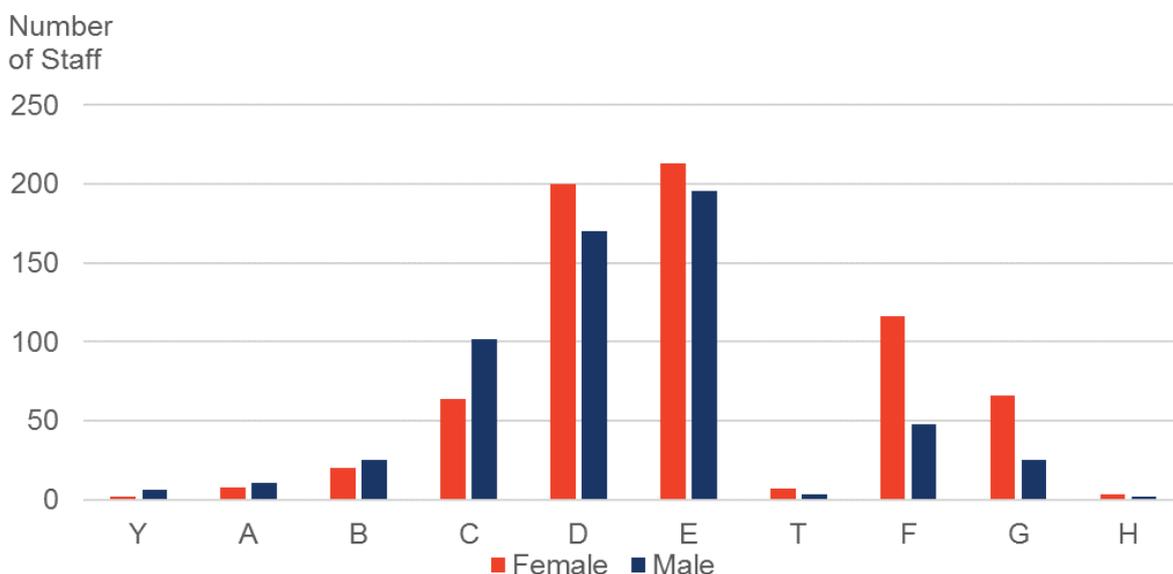
We have 1,287 employees as of 30 November 2018.



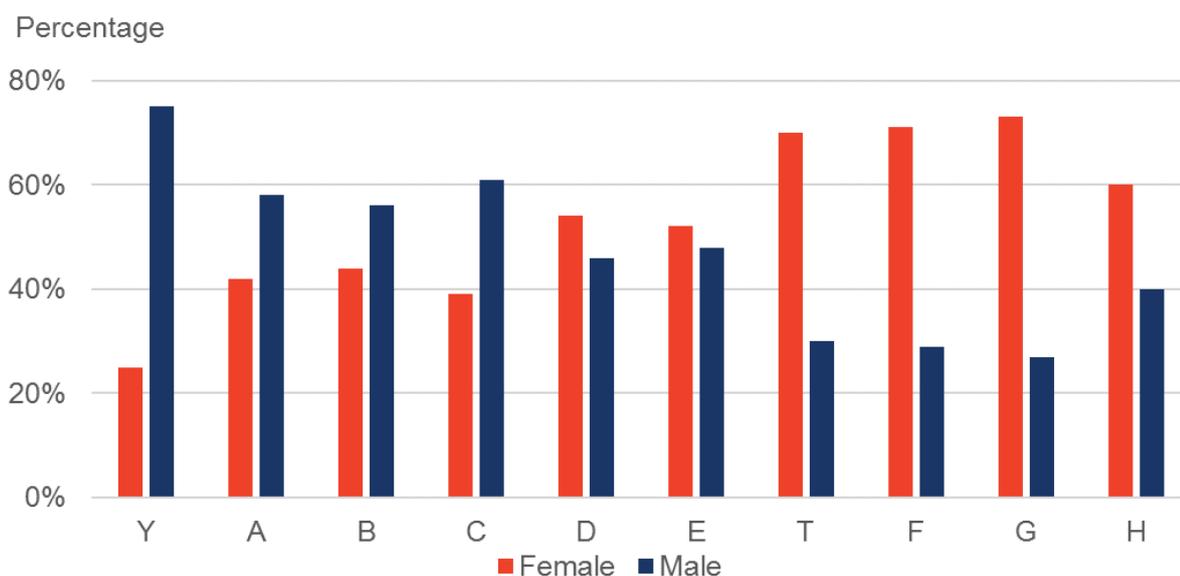
The gender split at 30 November 2018, shown above, is broadly similar to that reported in previous mainstreaming reports. The number of female employees in management grades has increased slightly, but they continue to be under-represented in management grades and over-represented at lower grades. This can be seen in the table on the next page. The actions we are taking to address this are outlined in Section 2 of this report where we discuss progress towards our equality outcomes.

Grade & Description	
Y	Chief Executive Officer, Executive Director, Director, and Chief Officers
A	Manager of key function
B	Manager of managers or national experts with management responsibility
C	Core unit manager or technical specialist
D	Supervisory or senior technical role
E	Core officer / technical role
T	Trainee core officer role
F	Support officer role
G	Administrative role
H	Office Assistant, Office Junior and Modern Apprentice

Staff by grade and gender



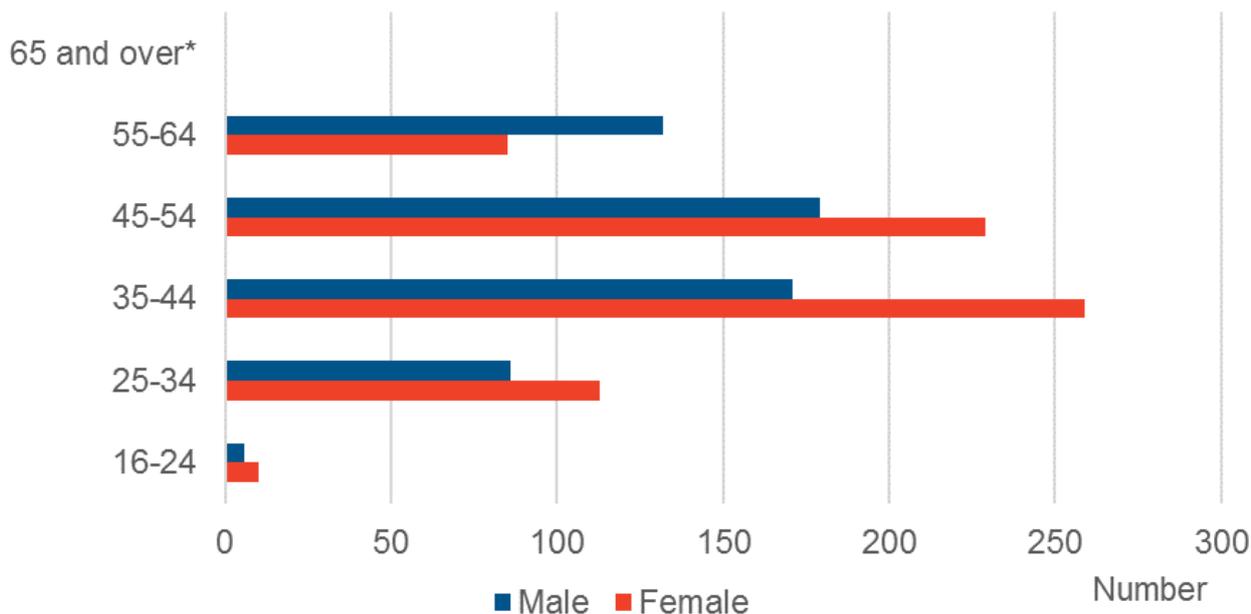
Percentage gender split by grade



Breakdown of SEPA staff by age group

We have taken steps to increase the number of young people employed in SEPA. While numbers are still low, we are continuing to work to address this, as outlined in Section 2 of this report.

Age group and gender

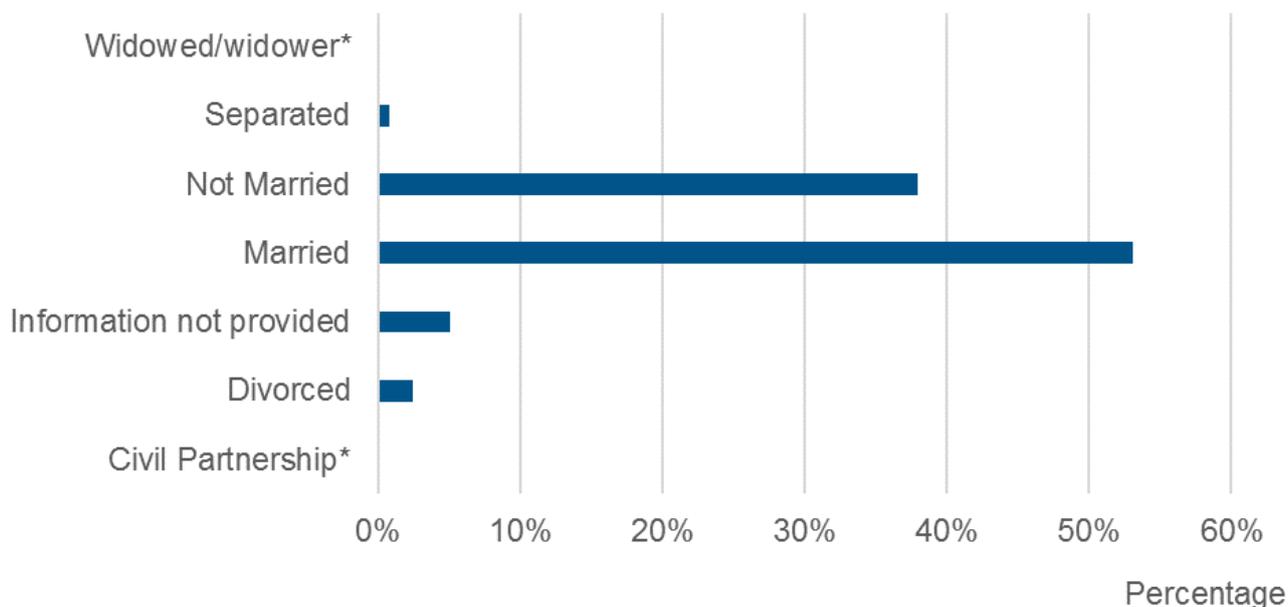


Age group and gender

	Female	Male	Total
16-24	10	6	16
25-34	113	86	199
35-44	259	171	430
45-54	229	179	408
55-64	85	132	217
65 and over	*	*	17
Total	*	*	1,287

The tables below and on the next page show our workforce broken down by ethnicity, declared disability, sexual orientation, religion and belief and marital status. Our staff profile is broadly similar to previous reports. This may be partly explained by our relatively low turnover rate compared to other organisations.

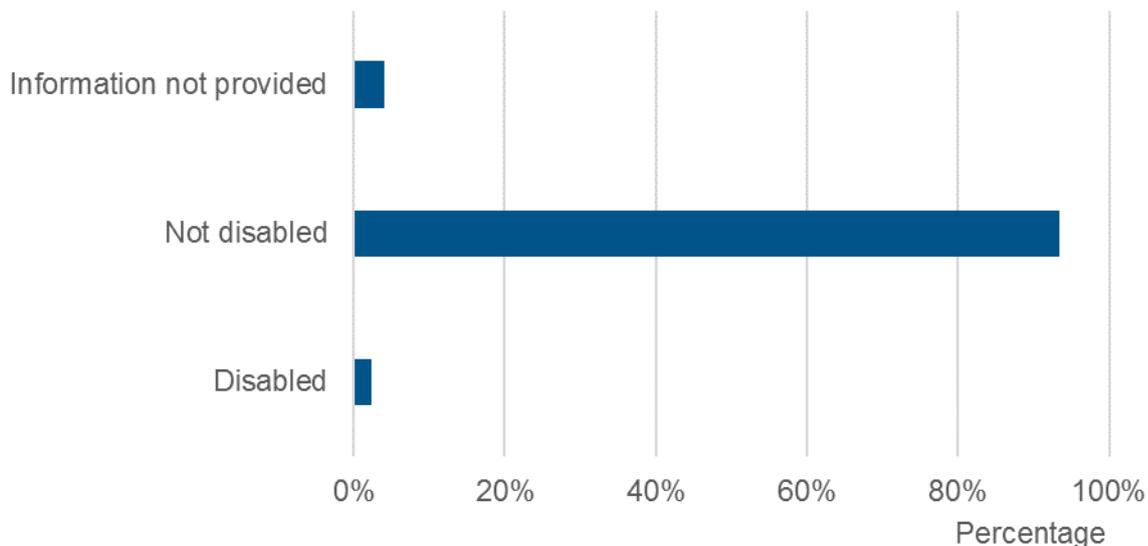
Marital or civil partnership status



Marital or civil partnership status

	Number of staff	Percentage
Civil Partnership	*	*
Divorced	31	2.4%
Information not provided	66	5.1%
Married	683	53.1%
Not Married	487	37.9%
Separated	10	0.8%
Widowed/widower	*	*
Total	1,287	100%

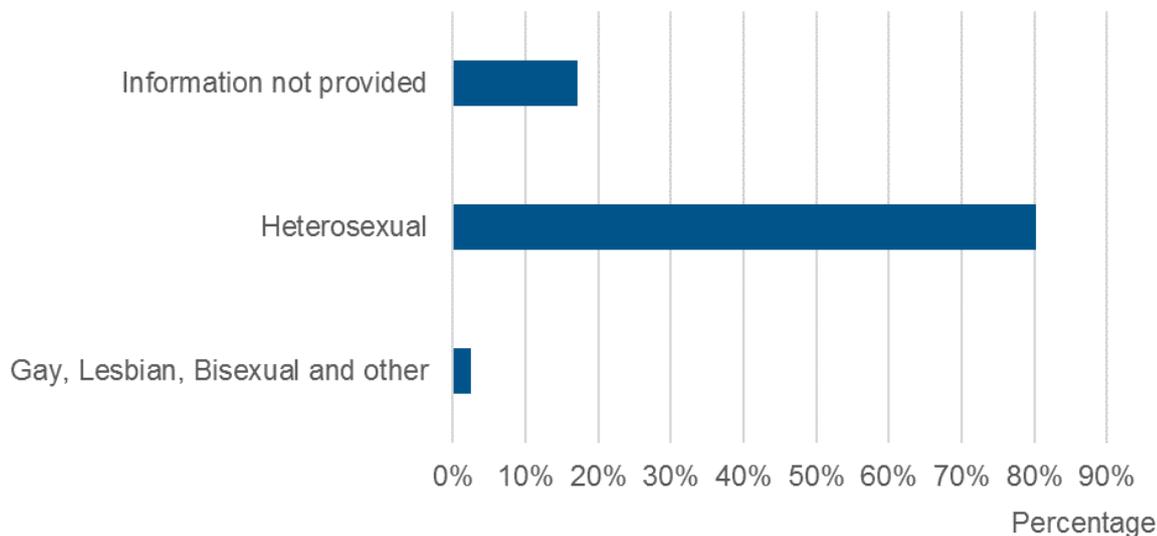
Disability status



Disability status

	Number	Percentage
Disabled	31	2.4%
Not disabled	1,203	93.5%
Information not provided	53	4.1%
Total	1,287	100%

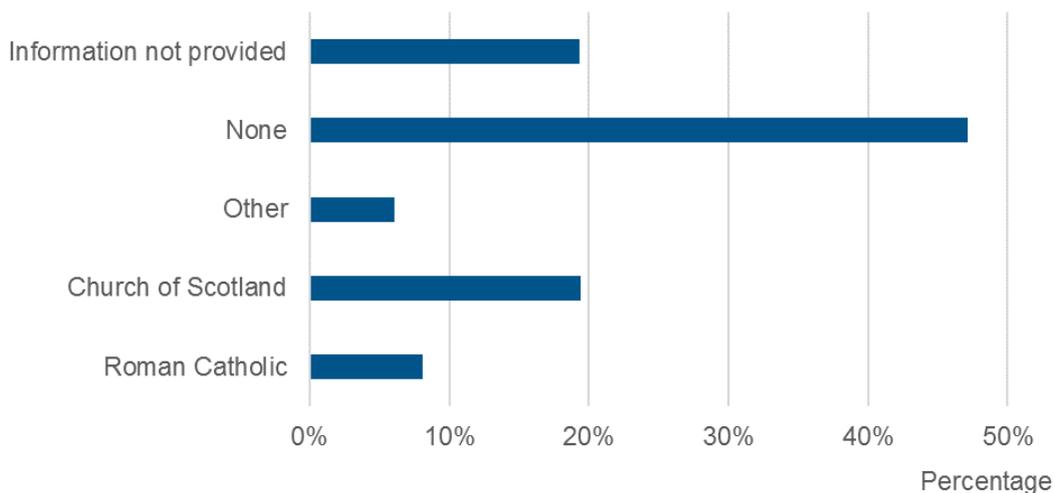
Sexual Orientation



Sexual Orientation

	Number	Percentage
Gay, Lesbian, Bisexual and other	33	2.6%
Heterosexual	1,034	80.3%
Information not provided	220	17.1%
Total	1,287	100%

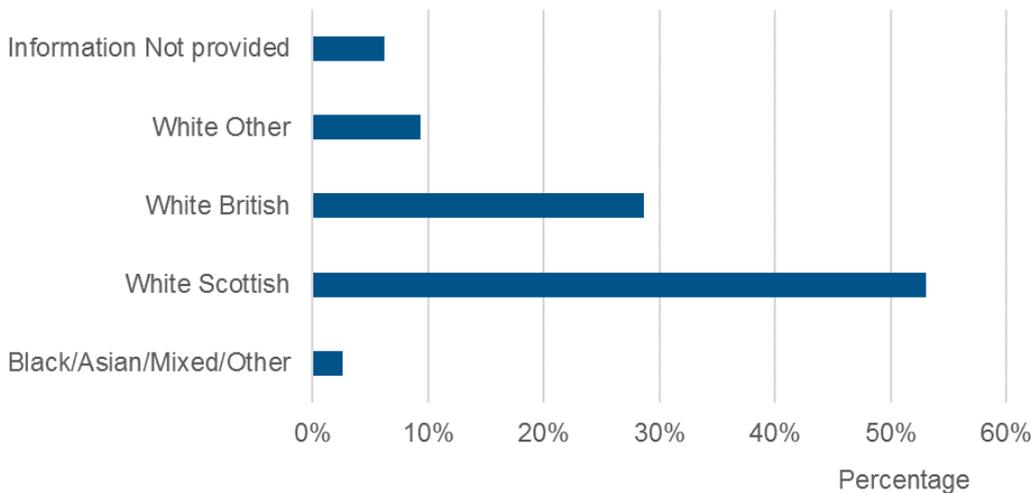
Religion and Belief



Religion and Belief

	Number	Percentage
Roman Catholic	104	8.1%
Church of Scotland	249	19.4%
Other	79	6.1%
None	606	47.1%
Information not provided	249	19.3%
Total	1,287	100%

Ethnic Origin



Ethnic Origin

	Number	Percentage
Black/Asian/Mixed/Other	34	2.6%
White Scottish	684	53.1%
White British	369	28.7%
White Other	120	9.3%
Information Not provided	80	6.2%
Total	1,287	100%

Recruitment

The following data represents all job applicants from 1 January 2018 to 30 November 2018. Over this period we had 115 recruitment campaigns receiving 2,349 applications.

As shown in the table below, we had more female candidates than male candidates in both the total number of applicants and successful applicants. This is one of the reasons for the overall gender split in the organisation.

Number of applicants by gender

Gender	Total applicants	Number of successful applicants
Female	1,274	67
Male	998	48
Information not provided	77	0
Total	2,349	115

Successful applicants by gender



We saw an increase in the number of young people applying for roles in SEPA in 2017 and 2018 which we attribute to our work on foundation apprenticeships, modern apprenticeships and graduate placements.

Section 4 – Board Diversity and Succession Planning

Our Board is responsible for the overall direction and performance of the organisation. Appointments to our Board are made by Scottish Ministers and are regulated by the Commissioner for Public Appointments in Scotland. Appointments are normally for a four-year term with the possibility of a further term subject to evidence of effective performance and satisfying the skills, knowledge and personal qualities required on the Board at the time of re-appointment.

We want a diverse Board to bring a range of ideas for driving forward our strategy and to stimulate healthy debate, leading to better decisions. A diverse Board helps us to better understand our customers and be more sensitive to a wider variety of groups. We have committed to the Scottish Government 50:50 by 2020 campaign, to improve the gender balance on public boards.

Since April 2015 the gender balance of non-executive members of our Board has remained 60% male and 40% female. This is despite a turnover of both male and female members leaving and joining the Board over the last four years.

The Board has created a Succession and Diversity Group to promote greater diversity when new members are recruited. The full Board receives verbal updates on the work of this group. A member of the group spoke at the Scottish Government On Board event on 10 December 2018.

A number of new board members will be recruited to our Board in 2019. We are working with the Public Appointments Unit in Scottish Government to widen the audience of recruitment advertisements, better promote the role of board members and improve the wider diversity of the candidates. Some of the steps we have recently taken to encourage a more diverse board are:

- revising the role description and personal specification;
- producing a video with both male and female board members speaking about the role;
- asking all existing Board members to promote recruitment in their own networks;
- approaching the women's business forum to promote the vacancies;
- revising the information available about our Board to make it easier to understand the role of the Board and individual members;
- informing Regional Equality Councils, Community Planning Partnerships and the Scottish Youth Parliament of the vacancies and providing information about the posts;

- reviewing the skills and experience that are used as basis for the development, recruitment and selection of board members;
- advertising vacancies using social media.

New board members will be appointed to our Board in January 2020.

Demystifying the role of public sector boards amongst our staff

We want all our employees to understand how we make decisions and how they can contribute to those decisions. We have a shadowing scheme which gives staff the opportunity to attend Agency Management Team and Board meetings. They also have the opportunity to meet with and chat to members of the board and management team. This allows all our staff, including those from groups who are not traditionally well represented on public sector boards, to find out how boards work and consider whether or not this is a role they would like to take on.

Feedback from a young, female member of staff

One of our board members told me that she joined her first board when she was quite young. I really enjoyed talking to her because I hadn't realised that young people can be on boards.

Section 5 - Pay gaps and equal pay

Gender Pay Gap

The gender pay gap is a measure of the difference between male and female mean earnings across an organisation and is expressed as a percentage of male earnings. The 'mean' gender pay gap is calculated by taking the average hourly salary by gender at each step within a pay grade. The totals for each step are then used to calculate an overall grade total and average hourly salary, based on full time for each gender. The 'median' gender pay gap is calculated by finding the mid-point hourly rate for all employees of each gender.

The mean is a useful measure as it includes the highest and lowest rates of pay so it more accurately reflects the gender difference across grades and pay points. However, the main measure used by the Office of National Statistics to report the UK pay gap is the "median". As the median calculation is not skewed by small groups of particularly high or low pay, it can provide a more accurate representation of the typical difference.

SEPA has tended to use the mean measure as this has tended to be more commonly used in Scotland, but since 2017-2018 has also used the median, to enable better comparison across the UK and Scotland.

The tables on the following pages show the mean and median gender pay gap for all employees at 31 March 2018 in line with our annual reporting schedules.

The data shows that at 31 March 2018:

Mean gender pay gap:

- We have an average overall organisational gender pay gap of 9.68%.
- Our average gender pay gap is less than the UK and Scottish average overall figures, which for 2018 are 17.1% and 13.9% respectively.

Median gender pay gap:

- Our overall median pay gap is 6.87%.
- This is noticeably lower than the Scottish median of 15%.
- The UK median is nearly 18%.

Mean hourly basic pay for all staff at 31 March 2018

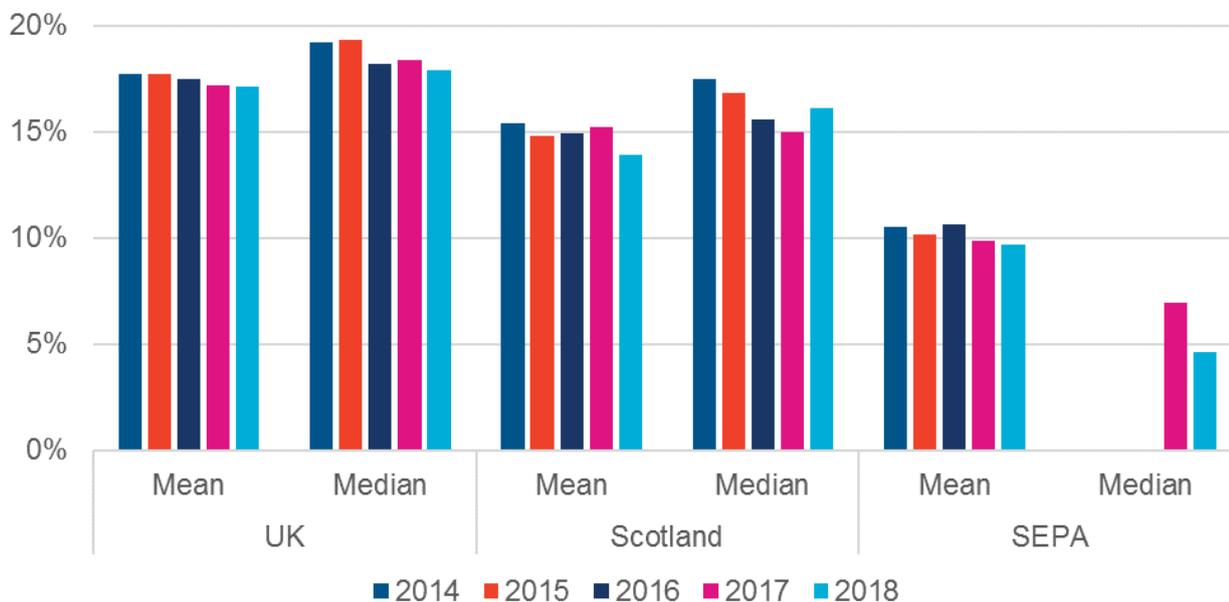
All staff		All female			All male			All pay gap	
Grade	Total staff	Staff in grade	% of staff in grade	Mean basic hourly wage for grade	Staff in grade	% of staff in grade	Mean basic hourly wage for grade	Mean hourly gender pay gap	Pay gap as % of male Mean basic hourly wage
Y	9	3	33%	£42.64	6	67%	£50.92	£8.28	16.3%
A	19	8	42%	£36.25	11	58%	£35.96	-£0.29	-0.8%
B	39	15	38%	£29.55	24	62%	£29.82	£0.27	0.9%
C	166	66	40%	£25.31	100	60%	£25.90	£0.59	2.3%
D	361	196	54%	£20.14	165	46%	£20.19	£0.05	0.3%
E	396	210	53%	£16.65	186	47%	£16.67	£0.02	0.1%
T	*	*	73%	£13.40	*	27%	£13.42	£0.02	0.2%
F	172	114	66%	£12.98	58	34%	£12.80	-£0.18	-1.4%
G	88	62	70%	£10.69	26	30%	£10.55	-£0.14	-1.3%
H	*	*	50%	£9.29	*	50%	£9.29	£0.00	0.0%
Total (exc Y)	1,256	681	54%	£17.79	575	46%	£19.49	£1.70	8.7%
Total (inc Y)	1,265	684	54%	£17.90	581	46%	£19.82	£1.92	9.7%

Median hourly basic pay for all staff at 31 March 2018

All staff		All female			All male			All pay gap	
Grade	Total staff	Staff in grade	% of staff in grade	Median basic hourly wage for grade	Staff in grade	% of staff in grade	Median basic hourly wage for grade	Median hourly gender pay gap	Pay gap as % of male median basic hourly wage
Y	9	3	33%	£42.63	6	67%	£54.78	£12.14	22.2%
A	19	8	42%	£38.72	11	58%	£35.21	-£3.50	-10.0%
B	39	15	38%	£29.83	24	62%	£30.54	£0.72	2.4%
C	166	66	40%	£26.49	100	60%	£26.49	£0.00	0.0%
D	361	196	54%	£20.90	165	46%	£20.90	£0.00	0.0%
E	396	210	53%	£17.29	186	47%	£17.29	£0.00	0.0%
T	*	*	73%	£13.32	*	27%	£13.32	£0.00	0.0%
F	172	114	66%	£12.11	58	34%	£13.00	£0.90	6.9%
G	88	62	70%	£10.84	26	30%	£10.84	£0.00	0.0%
H	*	*	50%	£9.29	*	50%	£9.29	£0.00	0.0%
Total (exc Y)	1256	681	54%	£17.29	575	46%	£18.13	£0.84	4.6%
Total (incl Y)	1265	684	54%	£17.29	581	46%	£18.13	£0.84	4.6%

The table below, based on data from the Office for National Statistics and Close The Gap, shows the national mean and median gender pay gaps for the last five years and how SEPA compares to these. The SEPA figures are based on financial year end data, as at 31 March each year.

SEPA pay gaps compared to UK and Scotland averages⁴.



SEPA pay gaps compared to UK and Scotland averages

		2014	2015	2016	2017	2018
UK	Mean	17.7%	17.7%	17.5%	17.2%	17.1%
	Median	19.2%	19.3%	18.2%	18.4%	17.9%
Scotland	Mean	15.4%	14.8%	14.9%	15.2%	13.9%
	Median	17.5%	16.8%	15.6%	15.0%	15.0%
SEPA	Mean	10.5%	10.2%	10.6%	9.9%	9.7%
	Median	*	*	*	7.0%	4.6%

In 2008 we carried out an equal pay audit, which showed a gender pay gap of 17.7%. We then put in place a new pay and grading structure to bring transparency, consistency and equity to our pay structure, with a fixed number of grades and pay points and all staff treated equitably within this. This resulted in a noticeable decrease in our gender pay gap, which continues to reduce each year. Our gender pay gap is consistently lower than the UK and Scottish average.

⁴ The mean figures for SEPA for 2014-2016 do not include the Agency Management Team.

We have a gender pay gap because, although we have a higher proportion of female staff compared to male (54% to 46% respectively) we have a greater numbers of female staff in the lower pay grades and a higher numbers male staff on higher pay steps and grades. We are working to address this by encouraging more women into higher grade positions. The work we are doing to achieve this is described in Section 2 under the outcome: SEPA's performance is enhanced by having a workforce whose diversity more closely reflects that of Scotland.

Race and Disability Pay Gap

As well as the gender pay gap, we also analyse and publish the pay gap information for the protected characteristic groupings of race and disability. Our equality monitoring data on ethnicity and has a completion rate of over 93%. The following tables give an overview of the breakdown mean hourly pay and ethnicity within SEPA.

Race Pay Gap

Grade	Total staff	Black/Asian/Mixed/Other			White Scottish			White British		
		staff in grade	% of staff in grade	Mean basic hourly wage for grade	Staff in grade	% of staff in grade	Mean basic hourly wage for grade	Staff in grade	% of staff in grade	Mean basic hourly wage for grade
Y	9	0	0%	£0.00	5	56%	£52.33	*	22%	£52.39
A	20	0	0%	£0.00	9	45%	£35.94	6	30%	£37.14
B	38	0	0%	£0.00	18	47%	£29.25	12	32%	£30.11
C	166	*	2%	£26.38	56	34%	£25.38	74	45%	£25.80
D	361	8	2%	£19.47	185	51%	£20.05	117	32%	£20.29
E	396	5	1%	£17.29	207	52%	£16.68	113	29%	£16.69
T	11	0	0%	£0.00	5	45%	£13.51	*	36%	£13.32
F	173	*	2%	£13.32	117	68%	£12.92	23	13%	£13.03
G	87	*	2%	£10.38	66	76%	£10.62	12	14%	£10.90
H	*	0	0%	£0.00	*	100%	£9.29	0	0%	£0.00
31/03/18	1,256	22	2%	£18.34	672	54%	£17.87	363	29%	£20.22
31/03/17	1,243	21	2%	£18.03	654	53%	£17.64	371	30%	£19.93

Race Pay Gap

Grade	Total staff	White other			Other			Information not provided		
		Staff in grade	% of staff in grade	Mean basic hourly wage for grade	Staff in grade	% of staff in grade	Mean basic hourly wage for grade	Staff in grade	% of staff in grade	Mean basic hourly wage for grade
Y	9	*	11%	£65.31	0	0%	£0.00	*	11%	£46.33
A	20	*	10%	£33.98	0	0%	£0.00	*	15%	£34.99
B	38	*	5%	£29.20	0	0%	£0.00	6	16%	£30.22
C	166	12	7%	£25.58	0	0%	£0.00	20	12%	£26.19
D	361	30	8%	£20.17	*	1%	£20.53	17	5%	£20.65
E	396	43	11%	£16.38	*	1%	£16.42	24	6%	£16.83
T	11	*	9%	£13.32	0	0%	£0.00	*	9%	£13.32
F	173	21	12%	£12.62	*	1%	£12.91	7	4%	£13.03
G	87	*	5%	£10.66	0	0%	£0.00	*	3%	£10.38
H	*	0	0%	£0.00	0	0%	£0.00	0	0%	£0.00
31/03/18	1,256	116	9%	£18.35	10	1%	£17.36	82	7%	£21.31
31/03/17	1,243	107	9%	£18.32	8	1%	£16.58	82	7%	£21.21

The group of staff who identify as 'Other' with regards to ethnicity have the lowest mean hourly salary at £18.11, which is a £3.76 (17.2%) gap compared to the highest mean hourly salary of £21.87 for the group who have not disclosed information regarding ethnicity. Only 10 staff are in the "Other" category, with all being in pay band D or lower, leading to the lower hourly rate. Those who identify as White Scottish, have the next lowest mean hourly salary at £18.57, which is a 16.5% gap compared to the group who have not disclosed information.

Overall, as the table shows, the salary gap has decreased over the period that we have been measuring this from 21.8% as of 31 March 2017 between the highest and lowest pay groupings to 17.2% at 31 March 2018.

Our occupational segregation by ethnicity at 30 November 2018

Grade	Race Declaration	Management	Policy	Regulatory	Science	Business & Support	Total
Y	Information Not Provided	*	0	0	0	0	*
	White - British	*	0	0	0	0	*
	White - Other	*	0	0	0	0	*
	White - Scottish	5	0	0	0	0	5
A	Information Not Provided	*	0	0	0	0	*
	White - British	6	0	0	0	0	6
	White - Other	*	0	0	0	0	*
	White - Scottish	8	0	0	0	0	8
B	Information Not Provided	*	0	0	0	0	*
	White - British	13	0	0	0	0	13
	White - Other	*	0	0	0	0	*
	White - Scottish	23	0	0	0	0	23
C	Black / Asian	0	0	*	0	*	*
	Information Not Provided	*	*	6	*	0	16
	White - British	29	18	11	10	7	75
	White - Other	*	*	*	*	*	11
	White - Scottish	35	*	10	*	8	60
D	Black / Asian	0	*	*	*	*	8
	Other	0	0	*	*	*	*
	Information Not Provided	0	*	9	*	6	19
	White - British	*	13	52	38	11	117
	White - Other	0	*	12	15	*	30
	White - Scottish	*	11	86	48	45	192
E	Black / Asian	0	0	*	*	*	6
	Other	0	0	*	*	0	4
	Information Not Provided	0	*	9	14	*	25
	White - British	0	*	47	56	12	116
	White - Other	0	*	22	19	*	49
	White - Scottish	*	*	87	68	49	209
F	Black / Asian	0	0	*	0	*	*
	Other	0	0	0	0	*	*
	Information Not Provided	0	0	0	0	5	5
	White - British	0	0	*	0	19	23
	White - Other	0	0	*	0	16	18
	White - Scottish	0	0	9	0	102	112
G	Black / Asian	0	0	0	0	*	*
	Information Not Provided	0	0	0	0	*	*
	White - British	0	0	0	0	14	14
	White - Other	0	0	0	*	5	6
	White - Scottish	0	0	0	*	65	66

Grade	Race Declaration	Management	Policy	Regulatory	Science	Business & Support	Total
H	White - Scottish	0	0	0	0	5	5
T	Information Not Provided	0	0	0	0	*	*
	White - British	0	0	0	0	*	*
	White - Other	0	0	0	0	*	*
	White - Scottish	0	0	0	*	*	*
Grand total	Grand total	151	62	377	291	404	1287

Key to staff grades

Grade & Description	
Y	Chief Executive Officer, Executive Director, Director, and Chief Officers
A	Manager of key function
B	Manager of managers or national experts with management responsibility
C	Core unit manager or technical specialist
D	Supervisory or senior technical role
E	Core officer / technical role
T	Trainee core officer role
F	Support officer role
G	Administrative role
H	Office Assistant, Office Junior and Modern Apprentice

The number of our staff who have declared a disability is very low so it can be difficult to draw trends from pay data. However, we can see that at 31 March 2018, the average hourly wage for those who declared a disability (£20.67) was higher than those who declared no disability (£18.67) and those who did not provide this information (£20.28). This represents a salary gap of 9.7% between the highest average hourly wage, those who declared a disability and the lowest and those who declared no disability.

The smaller percentage of staff who either declared a disability or did not disclose information, combined with a higher proportion of these staff being in pay bands E and above, results in the higher mean hourly rates shown.

Disability Pay Gap

Grade	Total staff	Disability declared			No disability declared			Information not provided		
		Staff in grade	% of staff in grade	Mean basic hourly wage for grade	Staff in grade	% of staff in grade	Mean basic hourly wage for grade	Staff in grade	% of staff in grade	Mean basic hourly wage for grade
Y	*	*	11%	£41.76	*	78%	£48.56	*	11%	£54.78
A	*	*	5%	£33.58	*	90%	£36.22	*	5%	£33.58
B	*	*	3%	£31.28	*	95%	£29.59	*	3%	£31.28
C	*	*	4%	£26.49	*	90%	£25.59	*	7%	£26.22
D	*	*	2%	£19.78	*	94%	£20.15	*	3%	£20.70
E	*	*	1%	£17.18	*	94%	£16.62	*	5%	£17.17
T	*	*	9%	£13.64	*	64%	£13.41	*	27%	£13.32
F	*	*	2%	£13.32	*	97%	£12.91	*	2%	£12.64
G	*	*	3%	£10.92	*	94%	£10.65	*	2%	£10.15
H	*	*	0%	£0.00	*	100%	£9.29	*	0%	£0.00
31/03/18	*	*	2%	£20.67	*	93%	£18.67	*	4%	£20.28
31/03/17	1243	27	2%	£20.12	1165	94%	£18.48	51	4%	£20.46

Our occupational segregation by disability at 30 November 2018

Grade	Disability Declaration	Management	Policy	Regulatory	Science	Business & Support	Total
Y	Information Not Provided	*	0	0	0	0	*
	No Disability Declared	6	0	0	0	0	6
	Disability Declared	*	0	0	0	0	*
A	Information Not Provided	*	0	0	0	0	*
	No	16	0	0	0	0	16
	Yes	*	0	0	0	0	*
B	Information Not Provided	*	0	0	0	0	*
	No	43	0	0	0	0	43
	Yes	*	0	0	0	0	*
C	Information Not Provided	*	*	*	*	0	*
	No	69	23	26	14	18	150
	Yes	*	*	0	*	*	*
D	Information Not Provided	0	0	5	*	*	11
	No	*	27	151	103	65	351
	Yes	0	*	6	*	0	8
E	Information Not Provided	0	0	9	10	*	22
	No	*	9	157	150	64	381
	Yes	0	0	*	*	*	6
F	Information Not Provided	0	0	0	0	0	*
	No	0	0	17	0	140	158
	Yes	0	0	0	0	*	*
G	Information Not Provided	0	0	0	0	*	*
	No	0	0	0	*	84	86
	Yes	0	0	0	0	*	*
H	Information Not Provided	0	0	0	0	0	0
	No	0	0	0	0	5	5
	Yes	0	0	0	0	0	0
T	Information Not Provided	0	0	0	0	*	*
	No	0	0	0	*	5	7
	Yes	0	0	0	0	0	0
Grand total		151	62	377	291	404	1287

Section 6 – Our Equal Pay Policy

Introduction

SEPA is committed to supporting the principle of equal opportunities in employment and believes that staff should receive equal pay for the same or broadly similar work, for work rated as equivalent and for work of equal value.

This statement covers our approach to equal pay and occupational segregation in regard of gender, race and disability as set out in the Equality Act 2010 and the Public Sector Equality Duty. We are committed to working with our recognised trade union, UNISON, to take action to promote and implement equal pay.

To minimise risk of pay inequity, SEPA implemented a pay and grading structure in 2008, which is underpinned by our job evaluation system. Since 2008, on an annual basis, we've conducted a pay equality impact assessment based on data as at 31 March. From 2013, on a bi-annual basis, our pay gap information has been published as part of our Equalities Mainstreaming Reports, which are available on our website.

Definitions

Under the Equality Act 2010, men and women in the same employment performing equal work must receive equal pay. Equal pay applies not only to salary, but to all contractual terms and conditions of employment, such as holiday entitlement, pension payments and other benefits. There are three kinds of equal work:

- like work - this is where the work involves similar tasks which require similar skills;
- work rated as equivalent - this is where the work has been rated under a fair job evaluation scheme as being of equal value in terms of how demanding it is;
- work of equal value - this is work which is not similar and has not been rated as equivalent, but is of equal value in terms of demands such as effort, skill and decision-making.

Aims and Actions

Our aim is to achieve and maintain equal pay and to ensure that our pay and grading and benefits structure is transparent, flexible, based on objective criteria and free from bias. We recognise that to deliver equal pay for our staff it will be necessary to consider all the causes of pay gaps and that these can go beyond discrimination within pay systems.

To achieve our aim we will continue to:

- conduct an annual pay equality impact assessment;
- publish pay statistics on an annual basis;
- use a job evaluation system to support our pay and grading structure;

- review and assess the impact of our pay practices, implementing appropriate actions to reduce any pay gap;
- inform staff of how their pay is determined;
- provide a “Total Rewards ” statement for each staff member on an annual basis;
- identify where there is occupational segregation and take appropriate steps to address this and ensure staff are represented at all levels and across all business areas;
- provide training and guidance to ensure that recruitment and employment practices promote equality and are free from discrimination and bias;
- provide all staff with fair and equal access to training, development and promotion opportunities and monitor uptake.

Responsibility

The Agency Management Team is fully committed to supporting our equal pay statement and objectives. The Chief Officer, People & Property, who is a member of the Agency Management Team, has overall responsibility for the aims and actions relating to equal pay and for ensuring that due consideration is given to the resources required to achieve equal pay. The Human Resources function has day to day responsibility for implementing, monitoring and reviewing equal pay.

Complaints

Queries about equal pay should be directed to hr@sepa.org.uk

Any grievances on equal pay should be raised and will be dealt with in line with our Grievance Procedure.

Monitoring and Review

It is important that our approach to achieving and maintaining equal pay remains effective so we will regularly monitor our actions and their impacts to ensure they remain appropriate and relevant. We will consult with our recognised trade union, UNISON, on any changes to this policy statement or on any other actions to promote and implement equal pay.