

## Equality Impact Assessment (EQIA)

### What is an EQIA?

An EQIA is a process of simply asking the question if any part of your proposed policy, project or service could be disadvantaging any part of our organisation or those who we work with. The outcome of the EQIA is to make sure that we prevent or limit, as far as possible, any negative effects or barriers that our work may have, even if these are unintentional.

We also use the EQIA to identify potential **positive** impacts of our work and take full advantage of any opportunities for promoting the business benefits of being an inclusive organisation.

There are 4 questions below on the EQIA Sheet, you may only need to answer the first one, but if you do identify any negative impacts, consult those who are impacted, and outline actions to mitigate if possible.

### Why do we need to do one?

The Equality Act (2010) puts a general legal duty on all public bodies like SEPA, it says we must “have due regard to the need to eliminate discrimination, advance equality and foster good relations.”

What does that mean in reality? It is simply a way of improving our policy development, service delivery and decision making to ensure we consider the needs of our staff, partners, and the local communities we serve, to identify potential steps to prevent any discrimination, to advance equality and foster good relations.

It will allow us to make better decisions as our work will be as useful as possible to as many people as possible.

You need to reflect on how people – and different groups of people and/or communities – might be affected by your policy, project, or event, directly or indirectly.

This a straightforward process, but a vital one that will help us to reach that goal of being a world class organisation.

**What are the Protected Characteristics?**

<b>Protected Characteristics under the Equality Act 2010</b>
<b>Age</b>
<b>Disability</b>
<b>Sex</b>
<b>Race</b>
<b>Religion / Belief</b>
<b>Sexual Orientation</b>
<b>Gender Reassignment</b>
<b>Pregnancy / Maternity</b>
<b>Marriage / Civil Partnership</b>

You can find out more about the protected characteristics on the [Equality and Human Rights Commission Website](#).

You can find evidence relating to the protected characteristics in Scotland on the Scottish Government's [Equality Evidence Finder](#).

# Equality Impact Assessment Sheet

<b>Project</b>	<b>DRS DIRECT REGISTRATION SERVICE (Deposit Return Scheme: DRS07 – Establishing the Regulator)</b>		
<b>Name of Project Lead</b>	Jo Zwiterslood, Project Assurance & Senior Responsible Officer	<b>Author</b>	Mary Anne Wood, Project Manager Jo Ramsay, Business Analyst
<p><b>Q1: Outline your new or revised process, policy, project, or event.</b></p> <p>The SEPA led Deposit Return Scheme (DRS) project is called “DRS07 Establishing the Regulator”. It is part of a wider programme of work to implement <u>DRS in Scotland</u>.</p> <p>This EQIA refers to our first project objective:</p> <ul style="list-style-type: none"> <li>SEPA needs to be prepared to receive producer registrations from 1<sup>st</sup> January 2023.</li> </ul> <p>Obligated producers can choose to join a Scheme Administrator to register for DRS, or they can register directly with SEPA. This EQIA covers direct registrations to SEPA only.</p> <p>SEPA will be providing multiple forms of access for direct registrants to SEPA, including:</p> <ul style="list-style-type: none"> <li>Online form, payment and confirmation</li> <li>Electronic documents - Pdf / word / spreadsheet</li> <li>Paper documents</li> </ul>		<p><b>Notes</b></p> <p>This EQIA does not cover producers who wish to join a Scheme Administrator to register for DRS. The Scheme Administrator will submit registrations to SEPA for these producers through a data transfer.</p>	
<p><b>Q2: Who will your project impact on? What evidence do we have of who the project will impact on?</b></p> <p>The DRS producer registration service will impact on:</p> <ul style="list-style-type: none"> <li>Direct registrants to SEPA (a nominated representative of an obligated business who will be required to providing registration information).</li> <li>SEPA staff</li> </ul>		<p><b>Notes</b></p> <p>The wider programme of work to implement Deposit Return Scheme in Scotland does not fall under SEPA’s project scope.</p> <p>This is the responsibility of Scottish Government and the DRS Scheme Administrator, Circularity Scotland Ltd.</p>	

SEPA has significant experience of providing licence registration services; the development of a new service for businesses obligated under the [DRS Regulations](#) will provide many benefits that will positively impact SEPA staff and end-users, including:

- Help regulated businesses meet their obligations and operate in a compliant manner which supports a positive environmental outcome for Scotland.
- SEPA will also provide a paper-based application service and guidance, which is designed to meet the needs of users who cannot, or chose not to, access the digital service.

SEPA has carried out a Phase 1 Discovery exercise with producers and retailers to explore the extent of possible impact(s). SEPA also commissioned an external agency, The Union, to complete an external stakeholder mapping exercise, which will inform and support our decisions on how best to make information available and accessible.

The following information has been used to inform this EQIA and further our understanding of the demographic of service users:

- 32% of adults had a long-term limiting mental or physical health condition or disability in 2017 (Source: SG [Scottish Health Survey 2019](#)).
- Only c. 50% of disabled people of working age are in work (Source: St. Andrews University).
  - According to the last SEPA Mainstreaming Equality report, 2.4% of staff declared a disability. However, anecdotally, HR colleagues believe there is a significant under-reporting of this, so we may not have a clear picture of how many colleagues have disabilities or what form these disabilities are.
- 2% of the working age population becomes disabled every year, 78% of disabled people acquire their impairment aged 16 or older (Source: Employers' Forum on Disability).
  - As with the wider Scottish workforce and population, SEPA's workforce is gradually aging and while the average age is in the mid-40s, it's important to recognise that this is increasing and with a higher number of older workers, the more pressing these concerns are.
- 10% of the population are believed to be dyslexic (Source: British Dyslexia Association).
- Estimated 1 in 7 people (more than 15% of people in the UK) are neurodivergent (Source: ACAS).

<ul style="list-style-type: none"> <li>• 6.2% of Scotland’s population cannot speak, read and write English. 3% of the population can speak English but not read or write it, and 0.2% of the population has no English at all (Source: 2011 National Census).</li> <li>• 26.7% of Scotland’s population have occasional challenges due to their lack of literacy skills. Of this percentage, 3.6% face serious challenges in their day-to-day lives (Source: Scottish Survey of Adult Literacies 2009).</li> </ul>	
<p><b>Q3: What impact will it have on people and different groups of people? Could your project negatively impact on those within the Protected Characteristics and effect their opportunity to access or benefit from it?</b></p> <p>Digital literacy is increasingly becoming the norm across Scottish society, it is widely used by industry and the public alike. While every effort has been taken to make the online forms inclusive and accessible, protected characteristic groups of an older age, who are not as familiar with the use of digital online services, might be impacted.</p> <p>Alternative forms of registration for direct registrants who are not comfortable with using online services/forms have been developed. These groups will be able to access a paper registration service and call on the guidance of a DRS operational team who can support them through the registration process.</p> <p>SEPA will keep the DRS digital registration service under regular review and improvement to ensure it is widely accessible and provides clear benefits.</p> <p>Whilst there is potential that the project may impact people who have a disability (particularly visual, hearing, dexterity, dyslexia, users without digital literacy skills, and people for whom English is a second language), the impact is likely to be minimal as we provide different routes for users to access the registration service (electronic documents, paper documents, telephone, and MS teams video conference call support).</p> <p>The digital registration service will use Microsoft Dynamics to process and assess applications. The advantage of using a Microsoft product is that they have carried out extensive accessibility testing, and their applications work with a wide range of assistive technologies such as screen readers. Microsoft 365 cloud products have been designed with accessibility built-in to meet the needs of people with different abilities.</p>	<p><b>Notes</b></p>

Q4 What actions will we take to eliminate, or limit to the best of our abilities, any negative impact?	Notes
<p>Whilst any negative impact is expected to be minimal, SEPA will monitor service use regularly, and take action to mitigate against these as far as possible. This will be kept under constant review and improvement to ensure our services are widely accessible and provide clear benefits.</p> <p>The online registration service has been developed in line with the Scottish Government’s digital strategy and Digital First assessment standards.</p> <ul style="list-style-type: none"> <li>• Online forms are simplified with one question per page and ask for the minimum information required by SEPA.</li> <li>• Questions are written in plain English to be as clear and simple as possible.</li> <li>• Display fonts, colours and sizes of text and controls are clear, consistent and in line with recommended guidance.</li> <li>• Similar online forms have been accessibility-tested with users that have visual, hearing, physical and cognitive disabilities. Key findings and recommendations have been reflected.</li> </ul> <p>An operational team will be available by email, phone, and MS Teams video call to help guide obligated producers who wish to register directly with SEPA, through the application process. Guidance will be provided for the digital service, electronic and paper documents.</p> <p>Signposting to Contact Scotland BSL on the SEPA website and verbally by operational team supporting registration applications, for users who wish to access an interpretation service.</p> <p>Digital, remote and telephone services (via SEPA’s Contact Centre) will be available for members of the public who may need to ask, complain or report a matter in connection with the <a href="#">DRS Regulations</a>.</p> <p>Guidance for staff and producers will be produced to help them understand DRS obligations and will be made available in digital (electronic/web-based text, also exploring video slides with voiceover format) and paper-based format; this can be supported by telephone/MS Teams contact if required.</p> <p>SEPA’s website will signpost to relevant guidance and services, partner organisations and routes to progress any queries which do not fall under the SEPA project scope.</p> <p>Once the registration service goes live, there will be an opportunity for staff and stakeholders to provide feedback to help improve the service going forward.</p>	


**SECTION THREE: PROJECT LEAD MUST SIGN OFF THIS FORM AND PASS TO AMT MEMBER/SENIOR LEADER RESPONSIBLE FOR THE PROJECT**

Lead Project Officer: Mary Anne Wood

<b>Signature:</b>	Digital signature.	<b>Date:</b>	12/12/22
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**SECTION FOUR: AMT MEMBER/SENIOR LEADER RESPONSIBLE FOR THE PROJECT SIGN OFF**

Senior Leader: Joanna Zwitserlood

<b>Signature:</b>		<b>Date:</b>	12/12/2022
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