

**Recruitment & Selection Policy & Procedure** 

See Equality Impact Assessment Policy and Procedure for detailed guidance on how to complete this form.

Section 1: Purpose and scope of policy

Title	Recruitment & Selection Policy & Procedure
New or existing	Existing
Owner	Marilyn Morgan
Officer(s) undertaking the EIA	Marilyn Morgan Ania Rolewska
What does the policy aim to achieve?	To ensure that the best and most suitable candidates are selected for appointment to positions within PSOW in accordance with PSOW equality duties, commitments and policies.
How is the policy related to other areas of work?	This policy links to:  ■ PSOW Corporate Plan 2019-22 (Strategic Aim 3: Use Resources Wisely)  ■ PSOW Equality Plan 2019-22:  ■ Objective 3.1: Capture comprehensive and meaningful equality employment data  ■ Objective 3.2: Act to improve the representation of protected groups in PSOW's workforce
Who is likely to be affected by this policy?	Internally: managers and members of the recruitment panel; current employees  Externally: potential candidates; applicants; successful candidates; and HR advisers

#### Section 2: Assessment of relevance and proportionality

#### Key points to remember:

- to assess relevance you <u>must</u> consider evidence related to all equality characteristics
- you must record <u>all</u> evidence considered in <u>section 4</u> of this form.

Question	No	Yes	Comments
Does the policy relate to PSOW's equality objectives and identified actions?			Objective 3.1: Capture comprehensive and meaningful equality employment data Objective 3.2: Act to improve the representation of protected groups in PSOW's workforce
Does the policy relate to functions that evidence, or previous activities have identified as being important to, particular characteristics?			PSOW job applicant equality monitoring data 2018/19 and 2019/20 indicated very good representation based on gender.  Conversely, it indicated under representation based on disability, ethnicity, nationality (different to Welsh, English or British) and age (people under 25 and over 55). The proportion of Welsh speakers among applicants is also lower than expected, although this may be due to the wording of the monitoring questions.
Does the policy relate to an area where there are known inequalities, or a significant potential for reducing inequalities or improving outcomes?		$\boxtimes$	Inequalities in employment opportunities are known to affect especially:  • women  • younger and older people  • people with disabilities  • people with caring responsibilities  • people experiencing socio-economic disadvantage
Is there evidence to suggest that this policy may affect			
equal treatment of people with certain characteristics			The policy is directly relevant to ensuring that all candidates for appointment to positions within PSOW are treated equally and fairly
meeting the needs of people with equality characteristics (including through provision of reasonable adjustments)		$\boxtimes$	The policy relates to provision of reasonable adjustments during the recruitment process

Question	No	Yes	Comments
participation of people with equality characteristics		$\boxtimes$	Yes, to the extent that the policy seeks to ensure that PSOW recruitment process is accessible to all people regardless of protected characteristics
community relations     between different     equality groups	$\boxtimes$		This policy is not clearly relevant to this aspect of the general equality duty, although by supporting equality, diversity and inclusion during recruitment process it will contribute to supporting also these qualities in PSOW's workforce.
Is there evidence to suggest that this policy may influence disadvantage due to people's socio-economic status?			Not clearly - due to the location of our office, our main recruitment catchment area is South Wales as well as adjacent English counties, which vary greatly in regional levels of material deprivation. However, we do also have an office base in North Wales, which extends our catchment area significantly. We also have in place flexible working policy which facilitates working remotely.
Is there evidence to suggest that this policy may affect opportunities for people to use Welsh or affect how PSOW treats the Welsh language?			Yes, in the sense that opportunities to use the Welsh Language will be in line with PSOW's existing or planned duties and commitment - our Welsh Language Policy and the Welsh Language Standards.

If you answer 'yes' to any of these questions, proceed to <u>section 3.</u> If a policy is not deemed relevant for conducting a full EIA, proceed to <u>section 5</u>.

#### Section 3: Full Equality Impact Assessment

#### Key points to remember:

- you must consider at this stage any need for collection of further evidence - including through engagement with groups potentially affected by the policy;
- you must record <u>all</u> evidence informing this stage in <u>section 4</u> of this form.

Characteristic		egati mpad			ositi mpa		n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise		egati npac			ositiv npac	_
	Н	М	L	Н	М	L			positive impact	Н	М	L	Н	М	L
General aspects								The policy as assessed will have a general positive impact on all groups of people as all candidates will be recruited through robust and fair recruitment processes. This is reinforced by the following elements:  • references in the policy to PSOW's equality duties and commitments  • commitment that job descriptions should not include any requirements that may directly or indirectly discriminate against any group in society;  • commitment to collect and analyse equality data of all candidates and clarification that this data will be used to help us ensure that our process is accessible and inclusive;  • commitment to remove equality data from all applications before they are passed on to the recruitment panel.	These general provisions can be further strengthened by underlining in the policy that these requirements will be also observed by any external provider involved in the recruitment process.  The policy does not currently specify the details of the advertising strategy. It could be strengthened by adding a commitment that advertising strategy will respond to priority areas identified by PSOW annually based on the analysis of equality monitoring of workforce and job applicants (e.g. disability, ethnicity).						
Age								The policy as assessed does not contain specific provisions regarding people's age. However, the general provisions in the policy as assessed are intended to ensure that the process is equal and fair for all candidates.	Additional general provisions of the policy regarding advertising strategy should help to maximise its positive impact on this group in line with priorities identified by PSOW.						
Disability				$\boxtimes$				PSOW registered in 2020 as Disability Confident Committed Employer. This is reflected in the policy, which underlines	The policy can also state that we will be recording requests for reasonable adjustments by the						

Characteristic	iı	egati mpa		i	ositi mpa		n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise	ir	gati		in	sitiv	_
	Н	M	L	H	M	L		that candidates with disabilities who satisfy essential criteria will be offered an interview. Our website shows that we are Disability Confident Committed, which is intended to encourage potential candidates. The policy also makes clear PSOW's commitment to provide reasonable adjustments. Beyond that, the general provisions in the policy as assessed (see above) are intended to ensure that the process is equal and fair for all candidates.	applicant to improve our understanding of accessibility of our process.  Additional general provisions of the policy regarding advertising strategy should help to maximise its positive impact on this group in line with priorities identified by PSOW.	Н	M	L	Н	M	
Gender								The policy as assessed includes a provision that the interview panel should include, where possible, a female and male member. PSOW commitment as Disability Confident Committed Employer could result in further benefits for women, with some data indicating that women were more likely to report as disabled than men.  Beyond that, the general provisions in the policy as assessed are intended to	Additional general provisions of the policy regarding advertising strategy should help to maximise its positive impact on this group in line with priorities identified by PSOW.						
Gender						$\boxtimes$		ensure that the process is equal and fair for all candidates.  The policy as assessed does not	ο					$\boxtimes$	
reassignment								contain specific provisions regarding this group. However, the general provisions in the policy as assessed are							

Characteristic		egati mpa			ositi mpa		n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise		gati npac		_	sitiv npac	_
	Н	М	L	Н	М	L			positive impact	Н	М	L	Н	М	L
								intended to ensure that the process is equal and fair for all candidates.							
Marriage & civil partnership						$\boxtimes$		O .	O					$\boxtimes$	
Pregnancy & maternity								The policy as assessed does not contain specific provisions regarding this group. However, the general provisions in the policy as assessed are intended to ensure that the process is equal and fair for all candidates.  However, they are reinforced by our Maternity, Paternity & Adoption policy already states that staff who may be away from the office on maternity, paternity or adoption leave should be made aware of any vacancies.							
Race								The policy as assessed does not contain specific provisions regarding this group. However, the general provisions in the policy as assessed are intended to ensure that the process is equal and fair for all candidates.	Ethnicity is likely to be a priority area for outreach and recruitment in 2020/21 and it is important to strengthen how the policy supports that. Positive impact on this characteristic should be strengthened by the additional provisions of the policy regarding advertising.  The policy can be also strengthened by stating that the composition of the recruitment panel should be balanced, as far						

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	Н	M	L	Н	M	L			positive impact	Н	М	L	Н	М	L
									as possible taking account of gender and ethnicity.						
Religion or belief									Additional general provisions of the policy regarding advertising strategy should help to maximise its positive impact on this group in line with priorities identified by PSOW.						
Sexual orientation								69	t)					$\boxtimes$	
Socio- economic status								The policy as assessed does not contain specific provisions regarding groups experiencing economic inequalities. However, PSOW commitment as Disability Confident Committed Employer could result in further benefits for people experiencing material deprivation, as some data indicates that those people are more likely to have disabilities. Beyond that, the general provisions in the policy as assessed are intended to ensure that the process is equal and fair for all candidates.  There is a possibility that certain job descriptions will require higher levels of qualifications which may lock out certain demographics from accessing our recruitment process. However, we already endeavour to avoid including a	We have in place a flexible working policy, with increasing numbers of staff working from home and working compressed hours. This can both facilitate commuting and help staff accommodate caring duties. The policy as well as the recruitment pack could be strengthened by including a reference and link to our flexible working policy.						

Characteristic		egati mpac			ositi mpa		n/a	Justification based on the evidence considered	Proposed actions to mitigate negative impact /maximise		gati npac			sitiv	
	Н	М	L	Н	М	L			positive impact	Н	М	L	Н		L
								requirement for a university level degree unless unavoidable.							
Welsh language								In line with the Welsh language standards, the policy is expected to have positive impact on  • opportunities for people to use the Welsh language, and  • treating the Welsh language no less favourably than the English language  by underlining PSOW commitment to  • assess and record need for Welsh language skills  • appropriately advertise needs for Welsh language skills  • conduct the recruitment process in Welsh or in English.  Beyond that, the general provisions in the policy as assessed are intended to ensure that the process is equal and fair for all candidates.  No negative impacts were identified.	Positive impact of the policy can be underlined even more strongly by stating explicitly that the composition of the recruitment panel will take into account also Welsh language requirements.						

#### Section 4: Register of evidence and engagement

#### **Existing evidence considered**

### Equality screening

PSOW workforce and job applicant equality monitoring data <u>2018/19</u> and <u>2019/20</u>.

Examples of assessments of similar policies by other organizations:

- Cardiff and Vale UHB
- Invest NI
- London Met

#### **Equality Impact Assessment**

**Age:** The evidence considered showed that people in age groups 16-24 and 55-64 were more likely than other age groups to experience lower employment rates.<sup>1</sup> People in age group 16 – 24 were also more likely than other age groups to experience insecure employment.<sup>2</sup>

**Disability:** The evidence considered showed that people identifying as disabled experienced much lower employment rates than non-disabled people (34.6% to 73.4%); more likely to work in low-pay occupations; and more likely to be living in poverty. This was particularly the case for those with mental health impairments.<sup>4</sup> These disadvantages were more likely to affect women<sup>5</sup> and people experiencing material deprivation. <sup>6</sup>

**Ethnicity:** As of December 2018, employment rate of people aged 16-64 in Wales from ethnic minority background was lower than the Welsh average.<sup>7</sup> A study in 2017 on the UK level found that 1 in 13 BAME employees were in insecure work, and strikingly 1 in 8 Black employees were in insecure work. The Black community are over twice as likely to be in temporary work than the average (2017).<sup>8</sup>

**Gender:** The evidence considered showed that of people aged 16-64 in Wales, men were more likely to be economically active than women,<sup>9</sup> and more likely to be in employment.<sup>10</sup> Women were also much more likely than men to work in caring, leisure and other service occupations, or sales and customer service occupations, or elementary occupations, which tend to have low pay. <sup>11</sup>

**Marriage and civil partnership:** The evidence considered showed that single people were more likely to be employed than married people or those formerly married. On the other hand, married people were more likely than the other two groups to be in high-pay occupations in 2016/17. <sup>12</sup>

**National identity:** The evidence considered showed that migrants make up about 17.4% of UK full-time workers, but only 7.5% of full-time workers in Wales. It suggested that migrants in Wales are also more likely that elsewhere in the UK to earn below £30,000 a year.<sup>13</sup>

**Pregnancy and maternity:** Nearly half of mothers in Wales (48%) reported a negative impact on opportunity, status or job security as a result of their pregnancy (Adams et al., 2016a). <sup>14</sup>

	<b>Religion:</b> The evidence considered showed that people of no religion (65.4%) had a higher employment rate in 2016/17 than either Christians (50.0%) or Muslims (48.3%) <sup>15</sup>
	<b>Sexual orientation:</b> According to another 2018 study, more than a third of LGBT staff (35%) have hidden or disguised that they are LGBT at work in the last year because they were afraid of discrimination. <sup>16</sup>
Additional evide	nce collected
Equality screeni	ng: n/a
Equality Impact	Assessment
Method of evidence collection	Consultation  HR Consultants All Staff Trade Union Representatives Equality Plan Group
Record of the evidence collected	Equality Plan Group: the feedback on the EIA was generally positive. Some slight wording changes were suggested. The members also suggested that our job ads could make it more explicit that we are actively looking to address under representation of some groups in our workforce. This could be a practical way of implementing the proposed commitment in the policy to use adverts more proactively to target some groups.
	Trade Union Representatives: no comments on the equality impact of the policy were received.
Date completed	Equality Plan Group: 3 June 2020
	Trade Union Representatives: August 2020

#### Section 5: Outcomes report

EIA stage completed	Screening				
	Impact assessmen	t			
Outcome of the EIA procedure	Proceed with policy	y – no changes			
	Make changes to p	oolicy			
	Do not proceed wit	h policy			
Action plan (full EIA only)					
Where actions are required to mit please specify:	igate the level of neg	gative impact or maxi	imise positive	impact,	
Key issue	Action to be taken	Responsible officer	Date for completio	n	
Ensure that the policy makes it clear that PSOW's equality duties and commitments in recruitment extend also to any external provider involved in the recruitment process	Add wording	MM	Completed	June 2020	
Strengthen references to vacancy advertising in line with PSOW equality priorities	Add wording	MM	Completed June 2		
Strengthen references to balanced composition of the recruitment panel based on gender, ethnicity and any language requirements/	Add wording	MM	Completed J	une 2020	
Strengthen references to reasonable adjustments monitoring (also in the related privacy notice)	Add wording	MM	Completed J	une 2020	
Emphasise PSOW support for flexible working.	Add wording and links to Flexible Working Policy in the policy and recruitment pack	MM	Completed J	une 2020	
Monitoring (full EIA only)		1	l		
Please outline monitoring arrangements	Updates to be mon	itored at approval.			

Please specify responsible officer	MT
Publication needs (full EIA only	
Was the impact deemed as substantial (high)?	YES (high positive impact in relation to general aspects; gender; disability; and race)
Authorised by the MT	
Date	13/10/2020

<sup>&</sup>lt;sup>1</sup> Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.

<sup>&</sup>lt;sup>2</sup> Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.

<sup>&</sup>lt;sup>3</sup> EMP17: People in employment on zero hours contracts ONS (18 February 2020)

<sup>&</sup>lt;sup>4</sup> Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.

 $<sup>^{5} \</sup>underline{\text{https://statswales.gov.wales/Catalogue/Equality-and-Diversity/Disability/disabilitystatus-by-age-sex} \\$ 

<sup>&</sup>lt;sup>6</sup> Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.

<sup>&</sup>lt;sup>7</sup> Annual Population Survey, Nomis.

<sup>8</sup> Insecure work and ethnicity TUC (2017)

<sup>&</sup>lt;sup>9</sup> Annual Population Survey, Nomis.

<sup>&</sup>lt;sup>10</sup> Employment rate by Welsh local area, year and gender, StatsWales (ONS) (2019)

<sup>11</sup> Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.

<sup>&</sup>lt;sup>12</sup> Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.

https://www.wcpp.org.uk/wp-content/uploads/2019/03/FINAL-WCPP-report Immigration-in-Wales-post-Brexit.pdf

 <sup>14</sup> Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.
 15 Is Wales Fairer? The state of equality and human rights 2018, Equality and Human Rights Commission, 2018.

<sup>&</sup>lt;sup>16</sup> LGBT in Britain - Work Report, Stonewall, April 2018.