

Equality Impact Assessment

Recruitment and Selection Policy

August 2026

1. Executive Summary

Environmental Standards Scotland (ESS) has undertaken an Equality Impact Assessment (EQIA) to assess the equality impact of the Recruitment and Selection Policy. This report provides the background to the policy, a summary of its potential impacts and outlines amendments to the policy to mitigate the negative impacts that have been identified.

It is ESS' legal duty under the public sector equality duty to consider how the organisation promotes equality through its policies. Alongside this legal duty, ESS also seeks to actively advance equality more generally across our work. This EQIA evaluates the positive and negative impacts of the policy on individuals with protected characteristics (equality groups) as defined in the Equality Act 2010.

ESS has also voluntarily chosen to consider the Fairer Scotland Duty in its work. ESS does this by integrating considerations of socio-economic disadvantage into its EQIA process.

The EQIA process is instrumental in ensuring that policies do not result in discrimination or victimisation of individuals with protected characteristics. Additionally, EQIAs can

assist in advancing equality of opportunity and help foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having completed the EQIA process, ESS is satisfied that no unlawful discrimination will arise from the implementation of this policy.

2. Summary of the policy

The policy sets out how ESS recruits and selects staff. It requires managers to follow consistent recruitment procedures that promote equality, diversity, transparency, and compliance with employment law and GDPR obligations. Recruitment decisions must be objective and focused on appointing the best candidate for the role.

The policy covers both internal and external recruitment, including approval of vacancies, advertising requirements, shortlisting, interviews, offers of employment, and candidate feedback. The policy also outlines appeal routes, record-keeping requirements, and responsibilities for managers and HR to ensure recruitment is conducted consistently and fairly across ESS.

3. What is the aim of the policy?

The purpose of the policy is to ensure that ESS recruits the most suitable person for the job. The policy aims to establish the principle of fair and open competition in the recruitment and selection process. All appointments must be consistent with ESS' obligations as an employer under current legislation and in accordance with current HR best practice.

4. Who is delivering the policy?

The policy is delivered by all ESS staff involved in the recruitment and selection process as well as HR staff.

5. Who may be impacted by the policy?

The policy will impact individuals who apply for employment at ESS and go through the organisation's recruitment and selection process.

6. Evidence

6.1 Summary of the evidence gathered

To support the framing discussion, we undertook further research to inform our analysis. We primarily referred to data published by the Scottish Government, in particular data from the Scottish Census (2022). Other sources of information included the UK Government, public bodies like the Social Mobility Commission and the Poverty and Inequality Commission, as well as third sector organisations such as Stonewall Scotland and the Equality Network. Most of the evidence gathered is from the last ten years. We consider this evidence to be robust and reliable.

6.2 Summary of engagement

A framing exercise was undertaken by three ESS staff members, two of whom are directly involved in the recruitment and selection policy.

7. Impacts

7.1 Summary of impacts identified

The framing discussion and further research identified several positive impacts of the policy in relation to eliminating unlawful discrimination, harassment and victimisation, and advancing equality of opportunity.

ESS adheres to the Civil Service Commission's Recruitment Principles, which require appointments to be made on merit following fair and open competition. Recruitment processes are designed to ensure decisions are based on objective, role-related criteria and are applied consistently to all candidates, helping to minimise the risk of unlawful discrimination, harassment and victimisation, and supporting fair and transparent access to employment opportunities.

Similarly, recruitment activity is supported by the Government Recruitment Service (GRS), the Cabinet Office's specialist recruitment function, which provides recruitment expertise, systems and services across the Civil Service and helps organisations deliver recruitment practices that are fair, effective and compliant with the Civil Service Commission's requirements.

The policy increases fairness and reduces bias in the recruitment process. All applications are blinded and anonymised to remove personal identifiers. This reduces the risk of discrimination across multiple characteristics including age, sex, race and socio-economic background.

Structured interviews and standardised scoring ensure that decisions are based on merit and prevents subjective judgements. The involvement of HR colleagues and an independent panel member ensures scoring is applied consistently.

The policy can also be seen to improve accessibility and inclusion. All candidates can request reasonable adjustments such as BSL interpreters, materials in different formats and interview adjustments. ESS' participation in the Disability Confident Scheme helps ensure fair access to interviews for disabled applicants. The advance notice of assessed behaviours at the interview supports neurodiverse candidates who can struggle with traditional interview formats.

The policy encourages greater equality of opportunity. ESS clearly advertises flexible and hybrid working options which can attract candidates with caring responsibilities, pregnant applicants and parents, and applicants from rural or disadvantaged areas.

Transparent recruitment processes such as clearly assessed behaviours help level the playing field for candidates without networks or access to those with knowledge of interviews. Additionally, the advertising of job opportunities across multiple platforms allows ESS to reach a more diverse candidate group.

Non-disclosure protections for pregnancy and gender identity protect privacy and reduce the risk of discrimination.

The assessment identified several potential negative impacts affecting each of the three elements of the Public Sector Equality Duty

A lack of transparency around maternity/paternity benefits and wider employee benefits could deter candidates with caring responsibilities or future family plans. Additionally, there are no signs of inclusion on the organisation job page and vacancy advertisements such as links to the equality and diversity policy or mentions of ESS being a Disability Confident Employer. This can reduce trust and confidence in applicants belonging to some protected characteristics.

The recruitment process can potentially penalise candidates with career gaps. This can disproportionately affect women with maternity and caring responsibilities and transgender individuals with transition-related gaps. However, it should be noted that the policy allows for applicants to voluntarily omit employment dates in their application.

In-person interviews may penalise pregnant candidates or those with caring responsibilities. Furthermore, there is no policy to reimburse travel or accommodation costs for interviews. This can disadvantage candidates from poorer socio-economic backgrounds. Recruiting managers should be mindful that interview dates do not conflict with any religious festivals or observances.

7.2 Summary of actions taken

Mitigating actions were identified and agreed during the framing discussion. These aim to address the potential negative impacts of the policy.

The primary action is to improve the visibility of employee benefits at ESS including maternity and family related entitlements. A dedicated 'benefits of working at ESS' document will be added to the organisation's vacancy webpage. This will also include links to ESS Equality and Diversity Policy and People Strategy. This should improve transparency and attract a broader range of applicants.

Additionally, to strengthen inclusion for disabled applicants the vacancy webpage will be updated to explicitly state that ESS is a Disability Confident Employer.

ESS will also explore additional advertisement platforms to broaden the range of applicants we receive.

7.3 Legal implications

Having completed the EQIA process ESS is satisfied that no unlawful discrimination will arise from review of this policy.

7.4 Review

The EQIA will be reviewed every three years by the Head of Investigations, Standards and Compliance and a further EQIA will be undertaken at that stage if required. Any associated impacts will also be considered on an ongoing basis.

This EQIA has been reviewed by the Head of Department and approved by the Chief Executive.

Reviewed by: Rebecca Peppiette

Date: 24/08/2026

Reviewed by: Mark Roberts

Date: 25/08/2026