

Commission response to the Ethical Standards
Commissioner

A consultation on potential revisions to the Code of Practice for Ministerial Appointments to Public Bodies in Scotland

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Contents

Introduction	2
About the Equality and Human Rights Commission.....	2
How we have approached this response	2
Terminology	2
Equality in Ministerial Appointments to Public Boards	3
The legal context.....	3
Existing inequalities.....	5
The Commissioner’s questions	6
Diversity Provisions in the Code of Practice (Questions 1-3 and 7-9).....	6
Evidence and Lessons Learned (Questions 4-6)	15
Refreshing Diversity Delivers (Questions 10-12)	16
Should the Code be more prescriptive? (Questions 15-17)	17
What changes, if any, should be made to the Code as a result of the coming into force of the 2018 Act? (Questions 18-19).....	18
Consulting the Scottish Parliament on prospective appointment plans (Questions 24-27)	18
Description of the attributes (Questions 28-30).....	19
Matching assessment methods to the attributes sought (Questions 31-32)...	19
Issues in the Commissioner’s guidance (Question 33)	20
Contacts.....	21
EASS	21

Introduction

About the Equality and Human Rights Commission

The Equality and Human Rights Commission is the national equality body for Scotland, England and Wales. We work to eliminate discrimination and promote equality across the nine protected characteristics set out in the Equality Act (EA) 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. We are an “A Status” National Human Rights Institution and share our mandate to promote and protect human rights in Scotland with the Scottish Human Rights Commission.

How we have approached this response

We welcome the Ethical Standards Commissioner for Scotland’s (‘the Commissioner’) invitation to respond to this consultation.

We welcome the focus on equality and diversity, as we aim to improve compliance with the Public Sector Equality Duty (PSED) by working with regulators to support public bodies’ compliance with their statutory equality obligations. We refer to case studies from various sectors throughout, to inspire progress in the public sector towards greater diversity.

We have only responded to those questions where we think we have something to contribute, and we have amalgamated some for brevity with a summary heading to structure our response. Some of our answers are applicable to more than one question but we have sought to avoid duplication in our response.

Terminology

The term ‘board members’ is used as shorthand in this response to mean members of public authorities and members of the boards of management of public authorities. Similarly, we refer to ‘board diversity’ in this response.

Equality in Ministerial Appointments to Public Boards

The legal context

The Public Sector Equality Duty

The [Public Sector Equality Duty \(PSED\)](#), which is found in section 149 of the EA 2010, requires public authorities, in the exercise of their functions, to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation that is prohibited under the EA 2010;
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations.

The broad purpose of the PSED is to integrate consideration of non-discrimination, equality and good relations into the day-to-day business of public authorities. For more detailed information, see our [Technical Guidance on the PSED in Scotland](#).

The Public Sector Equality Duty covers the following protected characteristics: age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. It also covers marriage and civil partnership, with regard to eliminating unlawful discrimination, harassment, victimisation or other prohibited conduct in employment.

The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 (as amended) support implementation of the general duty. They apply to [specific listed authorities](#).

The Scottish Government have announced that they intend to review the Specific Duties, and we will be working with them to ensure that they are made as effective as possible.

Specific duty on Scottish Ministers

There is a specific duty (Reg 6A of [The EA 2010 \(Specific Duties\) \(Scotland\) 2012 as amended](#)) on the Scottish Ministers to gather information on the protected characteristics of board members of particular listed authorities, collate this information and report it back to each authority.

The listed authority is required to use the information to better meet its general equality duty.

Fairer Scotland Duty

In April 2018, the [Fairer Scotland Duty](#) came into force (the socio-economic duty), which requires certain public authorities (including Scottish Ministers) to actively consider how they can reduce inequalities of outcome caused by socio-economic disadvantage when making strategic decisions.

The [interim guidance](#) is scheduled to be reviewed by the Scottish Government, and the Commission is conducting research on the effectiveness of the FSD to inform the review.

EA 2010 and personal and public office holders

The EA 2010 (sections 49 and 50) specifically protects those seeking appointment to, and those appointed to personal and public offices. Paragraph 11.36 of our [Employment Statutory Code of Practice](#) states that it is unlawful for anyone with the power to make an appointment to a personal or public office to discriminate against or victimise somebody. This covers:

- the plan for deciding who to offer the appointment to
- the terms on which the appointment is offered
- refusing to offer somebody the appointment.

Gender Representation on Public Boards (Scotland) Act 2018

The Gender Representation on Public Boards (Scotland) Act 2018 sets an objective for public boards to have 50% of non-executive members who are women. It also requires public bodies to take appropriate steps to encourage women to apply to become non-executive members to achieve the gender representation objective, and requires Scottish Ministers and other appointing persons to publish reports on progress towards achieving the objective.

Existing inequalities

While [the Commissioner's tracking and reporting of the baseline demographic membership of boards](#) evidences the success of parity between men and women on boards achieved in June 2020, it shows a concerning lack of progress in increasing the under-representation of people under 50 or from a visible Black and minority ethnic background since 2013, and a steady decline in proportion of people who declare a disability.

The numbers of LGB applications from 2014-19 have fallen short of the target each year, and the appointments target has only been met twice from 2014-2019, falling short in 2019.

This persistent under-representation is compounded by the fact that roughly 64% of applicants and 78% of appointees had household incomes above the median weekly household income in Scotland in 2019.

We reported on the state of equality in public appointments in our '[Is Scotland Fairer? \(2018\)](#)' report. We found that efforts were being made to address the under-representation of disabled people, women and people from ethnic minority groups in political life and on public boards, but there had been only limited success to date and we also noted the fall in the number of disabled people on public boards.

The lack of official data on protected characteristics in relation to political and civic life makes it difficult to fully assess the extent to which Scotland has seen progress or regress.

The Commissioner's questions

Diversity Provisions in the Code of Practice (Questions 1-3 and 7-9)

Should the Code have clear and specific provisions about the measures that the Scottish Ministers should adopt when planning to appoint new members in respect of diversity?

Yes.

Selection processes to public bodies should be clear, transparent and participatory in order to secure pluralism in members, representation of our communities and reflect the diversity of Scotland.

As stated above and in the Commissioner's consultation paper, there is a persistent lack of progress in increasing the representation of certain groups on public bodies. In turn, according to [Stonewall Scotland](#) and the [Scottish Business Pledge](#), Scotland's public bodies are being held back from being able to:

- properly understand the needs of our diverse Scottish society
- maintain good organisational reputation
- attract, recruit, retain and develop high performing board members

A greater reach of recruitment advertising and receipt of more applications could lead to greater board diversity and fewer failed recruitments, saving money and time.

As noted in the consultation paper, the pandemic and the protests at home and abroad in the wake of George Floyd's death in Minnesota have forcefully reminded us of the many significant inequalities that persist in Scotland. In this context, the importance of diverse public boards has never been clearer, and more diverse boards are an essential response to these moments.

We therefore agree that Scottish Ministers should be guided by more explicit provisions to be able to draw from the widest pool of talent available to them and that where possible, and lawful, there should be a greater expectation that positive action will be used.

The suggestions for positive action below are not new. In fact, many are recommended in [Scottish Government social research from 2014](#). Revising the Code to suggest positive action as an option should encourage fresh, proactive implementation for groups currently under-represented on public bodies.

What factors should be considered and why? Should diversity be expanded to include other factors such as household income?

Ministers should look to improve the diversity of public bodies by enabling or encouraging applications from those with a particular or multiple protected characteristic(s) or socio-economic background(s), provided selection is made on merit.

In particular, **there should be a focus on increasing the representation of under 50-year-olds, ethnic minorities, disabled people, LGBT people and [people from lower socio-economic backgrounds](#) (of which low household income is only one of many indicators which should be taken into account),¹ as well as maintaining the parity between men and women.**

Intersectionality

We welcome the Commissioner's acknowledgement of the importance of intersectionality highlighted by the First Minister's National Advisory Council on Women and Girls, and intention to report on some key intersectional data in the future.

We also note the recommendation in the [Expert Reference Group on COVID-19 and Ethnicity: recommendations to Scottish Government](#) about intersectional analyses of ethnic minority inequalities.

¹ Scottish Government, '[The Fairer Scotland Duty: Interim Guidance for Public Bodies](#)' (2018) – 'In broad terms, 'socio-economic disadvantage' means living on a low income compared to others in Scotland, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services. Socio-economic disadvantage can be experienced in both places and communities of interest, leading to further negative outcomes such as social exclusion', 7.

Reporting should cover intersectionality related to the protected characteristics in the EA 2010 and characteristics of socio-economic disadvantage identified by the Scottish Government in the [interim FSD guidance](#).

Any new provisions should emphasise the importance of intersectional analysis of the membership of boards. This can better tackle inequality of outcome than analysing headline statistics alone, and lends itself to the relatively small number of people on boards, which can make achieving diversity particularly challenging.

The provisions should suggest intersectional analysis of any new measures in appointment plans to better redress under-representation by people who experience multiple disadvantage on the basis of protected characteristics and/or socio-economic disadvantage, which renders them at a higher risk of being under-represented on boards.

Such analysis should take into account that some people experience fewer disadvantages than others because of the intersecting categories in which they are simultaneously positioned.

Types of evidence to support an intersectional analysis can include:

- qualitative case studies, ethnographies and social research
- literature/evidence reviews, background/contextual analysis
- quantitative analysis that uses categories of identity, including equality monitoring

Reference to existing duties

The Code should clearly reference the Ministerial obligations under the PSED and FSD:

- to have due regard to the need to advance equality of opportunity (PSED) and
- to actively consider how they can reduce inequalities of outcome caused by socio-economic disadvantage when making strategic decisions under the Fairer Scotland Duty (FSD).

Equality impact assessment

The Code should reinforce that, under the Specific Duties, Scottish Ministers are required to assess and review the impact of policies and practices against the needs of the general equality duty. Also, Scottish Ministers should actively consider the FSD when making strategic decisions.

To address any disadvantage or disproportionately low representation by certain protected characteristics, the code should encourage evidence-based equality impact assessment of application and assessment policies and practices to appoint new members to public bodies.

As stated in [our guide for public authorities in Scotland on Assessing impact and the PSED](#), such equality impact assessment should be based on a robust analysis of the relevant evidence relating to equality groups and evidence received from equality groups themselves.

If there is insufficient evidence to properly assess policies and practices, appropriate and proportionate measures may be required to fill these gaps, such as commissioning research or involving relevant groups, including through working with partners.

The assessment process could involve **addressing any evidence gaps** in the following ways:

- research on board diversity focussing on age and race ([Baker et al, 2020](#)) and tracking and reporting of the representation of trans people on public bodies
- intersectional analysis of the demographic membership of boards²
- strategic data collection³

² I.e. taking into account the interconnected nature of the protected characteristics, socio-economic disadvantage, and the unique forms of multiple or overlapping discrimination or disadvantage some people experience in the appointments process.

³ For example, to allow for a break down by race or disability, rather than being published as 'white/non-white' or 'disabled/not disabled'. EHRC, ['Is Scotland Fairer?'](#) (2018) p. 116. We are also working closely with the Scottish Government on various projects to improve the collection of protected characteristic data.

- gender-sensitive sex disaggregated data collection⁴

Public bodies need to be asking under 50-year-olds, ethnic minority groups, disabled people, LGBT people and people from lower socio-economic backgrounds how best to support them to apply for public appointments. Inclusive approaches need to be developed for different groups: one size does not fit all.

The evidence should be used in any assessment which should result in proposals which mitigate any potential disadvantage under-represented groups are already experiencing and may experience as a result of any new measures.

EA 2010 and actions that can be taken to improve diversity on boards

The [Employment Statutory Code of Practice](#) sets out in Chapter 12 that there is a continuum of actions that can be taken to improve diversity on boards.

Action taken to benefit those from one particular protected group that does not involve less favourable treatment of those from another protected group, or to eliminate discriminatory policies or practices, will normally be lawful.

Therefore, the Code (of Practice for Ministerial Appointments to Public Bodies in Scotland) should include steps to improve awareness and access, adjusting processes to meet the particular needs of a protected group, or training staff to recognise these needs (see specific recommendations re. training under the 'Mainstreaming' heading on page 14).

⁴ Gender-sensitive sex disaggregated data is broken down by sex... and comprises statistics and other information that adequately reflect gendered differences and inequalities in the situation of women and men.' Engender (April 2020), ['Covid-19: Gathering and using data to ensure that the response integrates women's equality and rights'](#), 2

Other examples which the Code could include:

- providing information at the application stage to make the process more supportive and accessible, **creating accessibility standards for application packs**.

- **advertising widely and targeting opportunities for under-represented groups and adapting communications as appropriate**
 - TMP helped Creative Scotland to become the first body to meet the Government's call for all public boards to have a 50:50 gender split. They crafted advertising copy which would appeal to their target audience, and used a Social Network Advertising Package to target a diverse group through social media.

- **extending searches into sectors or industries where under-represented groups are better represented at public body membership level**

- **broadening the recruitment criteria and appointment panel members' understanding of them, to include candidates with relevant expertise and experience from less traditional backgrounds, and making diversity a priority in role descriptions and for appointment panel** (Clarke. M, 2019). For example, see our recommendation about lived experience in our answer to questions 28-30 on page 19.

Positive action

There are actions which the Code should suggest which fall within the framework of the EA 2010's positive action provisions.

These actions are only lawful if they meet the statutory conditions for positive action measures and do not exceed the limitations set out in the EA 2010.⁵

Where the conditions for general positive action have been satisfied (see our Guidance on Appointments to Boards and Equality Law and Chapter 12 of the Employment Statutory Code of Practice), **it is lawful for Scottish Ministers to**

⁵ Positive action is distinct from positive discrimination, which is unlawful, unless a statutory exception applies.

take proportionate positive action which has the aim of enabling or encouraging people who share a protected characteristic to:

- overcome or minimise a disadvantage connected to that characteristic
- meet any needs that are different from the needs of those who do not share that characteristic, or
- participate in an activity where their participation is disproportionately low.

Please see below some examples of positive action from the guidance mentioned above, accompanied by some examples from various sectors.

- **setting and reporting on aspirational diversity targets within a particular timescale** (eg. Using bespoke SMART⁶ plans to redress the under-representation of under 50-year-olds, ethnic minority groups, disabled people, LGBT people and people from lower socio-economic backgrounds, but **with an intersectional approach** as proposed above), for example:
 - [The Scottish Government's Public Appointments Race Equality Action Plan 2019-2022](#) which aims to encourage more people from black and ethnic minority backgrounds to apply for public appointments
 - [The Scottish Government's 50/50 by 2020 campaign](#) which encouraged public, private and third sector organisations to sign up to the Partnership for Change and to set a voluntary commitment for gender balance on their boards of 50/50 by 2020
 - The UK Government's [Public Appointments Diversity Action Plan 2019](#) sets out a roadmap for realising an ambition that half of all public appointees will be female and 14 percent of public appointments will be from ethnic minority groups by 2022. It recommends a mentoring scheme to improve diversity in public appointments, alongside new approaches to recruitment and induction training.
 - In England and Wales, [ACEVO has stated](#) that by 2024, 40 per cent of its staff and trustees will be people of colour and 20 per cent will have disabilities
 - [The Young Trustees Movement](#), an intersectional movement, aims to double the number of trustees aged 30 and under on charity boards by 2024, including defining what conditions allow for safe spaces where all young people can genuinely add their perspective

⁶ Specific, Measurable, Actionable, Realistic and Timebound.

A consultation on potential revisions to the Code of Practice for Ministerial Appointments to Public Bodies in Scotland

- Throughout Scotland's 'Year of Young People' in 2018, members of the [OSCR Governance Forum](#) worked with the [International Voluntary Service](#) to promote their 'Young Trustee Campaign' (asking for 250 charities to pledge to recruit a young person ['26 and under'] to their board)
- Signatory campaigns, diversity charters and action planning
- **providing networking, development, mentoring and sponsor programmes, offering opportunities to under-represented groups who share a protected characteristic to shadow existing board members and/or observe board proceedings** (this can ensure a pipeline of diverse talent for future appointments)
 - As well as taking steps to attract recruitment of young Board members ([Charities Aid Foundation, 2015](#)), children and young people can be appointed as advisors to boards to help ensure their views are heard in decisions affecting them. Boards should also be encouraged to learn from best practice in [consulting with diverse groups of children and young people to help inform their decision-making](#).
 - [Empower Trustees](#) is a mentoring programme ran by The Empower Project. This opportunity is for young women to have a collaborative learning opportunity to find out about the leadership and governance skills you need to be a trustee, with support to find a board position at the end of the programme.
- **using tie-break provisions** (s.159 of the EA 2010 – see [Employment Statutory Code of Practice](#) and [Supplement to the Employment Statutory Code of Practice](#)) **to appoint equally qualified diverse candidates**, however, the public body must not have a policy on treating any group more favourably in connection with appointments.

The Code should suggest a range of positive action and other measures for public bodies to choose from depending on their specific diversity targets, recognising that there is no 'one size fits all' solution and that that any positive action measures must be a proportionate means of achieving one of the three relevant aims set out on page 12 of this response.

It should make clear that any measures adopted should be monitored to see what works and reported on in order to inform future appointments ([Northern Ireland Assembly, Potter, M. 2016](#)). In this way, reports can help public bodies learn from one another to become more diverse.

Equality mainstreaming

The Code should encourage public bodies to demonstrate leadership in mainstreaming equality, including commitments to:

- Improve the diversity of appointment panels
- Develop panel members' accountability for diversity, targets and equalities competence (the skills, knowledge and analytical capacity to think about equality and the intersectionality of inequalities); unconscious bias; and any positive action measures, with particular strategies and expertise for different protected characteristics.⁷
- Ensure appointing panel members have all received training on equal opportunities in recruitment (including unconscious bias and reasonable adjustments) and managing tie-break situations.
 - The British Red Cross responded to findings that applicants with White-sounding names were interviewed far more often than those with African or Asian-sounding ones, even if the applications were otherwise identical. They updated their recruitment and selection processes, trained staff on diversity and unconscious bias, using name-blind applications and collecting key diversity metrics. (Third Sector, 2017).
 - The Scottish Football Association's Equality and Diversity Board includes six independent advisors, a Scottish FA Youth Ambassador and Equality Board Champion to support the delivery of their Equality and Diversity 2017-20 Action Plan.
 - In 2014, Stonewall worked with trans experts to equip their staff with trans history and other information, and took steps to ensure that trans expertise was reflected in the make-up of the Board.

⁷ Ritch.E, Creating Public Spaces for Women and Men; UK Cabinet Office, 'The Lord Holmes Review' (December 2018), 39; Observatory for Sport in Scotland (Dennehy. J), 'Gender diversity in sport and its impact on governance infrastructure, practice and participation in Scotland' (2020).

Accountability

The Scottish Ministers should gather the necessary information to trigger the specific duty of relevant listed authorities⁸ to publish information on their board demographic and set out the action they have taken and will take in the future to improve the diversity of their members. The publication should form part of their mainstreaming report. Once this has happened, the Commissioner could consider including reference to this specific duty in its Code, to promote compliance.

Evidence and Lessons Learned (Questions 4-6)

Should the Code include more prescriptive requirements to ensure that lessons are learned on an ongoing basis and that decisions taken by panels are always informed by evidence?

Yes, if it's included in the Code there will be more transparency and accountability.

If so, what requirements should be included and why?

Please refer to our recommendations in our answers to (Questions 1-3 and 7-9) related to:

- intersectionality
- a clear reference in the Code to the obligations under the PSED and the FSD, to ensure clear vertical accountability for public bodies' diversity targets, and to encourage better overall compliance with these duties
- addressing any evidence gaps as part of equality impact assessments

⁸ A relevant listed authority is, subject to certain exceptions, one whose members, or whose board of management, include at least one appointed member. Under regulation 6A, EA 2010 (Specific Duties) (Scotland) Regulations 2012, none of the following are relevant listed authorities: a) the Scottish Ministers; (b) a council; (c) a joint board; (d) a licensing board; (e) an education authority; (f) an individual holder of a public office.

Refreshing Diversity Delivers (Questions 10-12)

What specifically should be updated/refreshed in the strategy and why?

As previously stated, the proportion of people under 50 and people from a visible ethnic minority background are almost the same as they were a year after the 2013 code was introduced.

The Commissioner's '[Delivering Diversity Ten Years On](#)' report finds that the proportion of people on boards who declare a disability has steadily declined and the top 5% earners in the UK are far more likely to be appointed than others who have applied.

These outcomes fall short of the anticipated impact of the recommendations in the Diversity Delivers strategy, and in some areas, there has been a lack of measurement of success or impact reporting (for example, 'for regional bodies, make sure the applicant pool reflects the ethnicity of the regional population') ([The Commissioner, 2019, 6](#)).

We note the Commissioner's concern that diversity and inclusion are not integral to every stage in the appointment round, unconscious bias training is not tailored to board recruitment,⁹ and development activities are mostly limited to new appointees. The Commissioner states that the monitoring information gathered for every appointment is not being analysed to inform appointment activity in the way originally anticipated by the strategy.

Any activities which have either had no or limited progress should be refreshed and completed actions replaced with new published, ambitious and targeted action plans or strategies which are SMART and reported on in equality mainstreaming reports.

⁹ Unconscious bias training is mostly effective for raising awareness but is unlikely to eliminate implicit bias or generally designed to reduce explicit bias. See EHRC, '[Unconscious bias training: an assessment of the evidence for effectiveness](#)' (2018) for more info.

Should the Code be more prescriptive? (Questions 15-17)

Should the Code be more prescriptive in this area and require panels to base appointment plan decisions on evidence of what works well to attract and appoint the right calibre of applicants?

Yes.

We cannot simply assume a trickle-down effect from a general focus on equality without being prescriptive in terms of what evidence appointment plan decisions need to take into account. We need only look at the existing inequalities listed on page 5 of this response to know this is true.

What should these requirements consist of and what measures should be adopted to achieve board diversity in relation to protected characteristics, sector worked in and socioeconomic background? Please give reasons for your answers.

Please see our recommendations in our answers to Questions 1-3 and 7-9 and 28-30.

What changes, if any, should be made to the Code as a result of the coming into force of the 2018 Act? (Questions 18-19)

The Code should be updated to reflect the Gender Representation on Public Boards (Scotland) Act 2018.

What legitimate grounds for choice should be specified?

The Code could reference the statutory guidance associated with the 2018 Act, which goes into more detail on the issue of legitimate grounds for choice at paragraphs 3.15 and 3.16.

Consulting the Scottish Parliament on prospective appointment plans (Questions 24-27)

Should the Code place an obligation on the Scottish Ministers to consult the Scottish Parliament on the prospective appointment plan for roles that require parliamentary approval?

Yes.

The Scottish Parliament can play a critical role in holding the Scottish Government to account by scrutinising their appointments strategy to ensure it properly includes equality matters.

However, care must be taken that information which may reveal personal data, or identification of an individual who benefitted from any positive action measures adopted is not revealed.

Description of the attributes (Questions 28-30)

Should the description of the attributes sought in new board members be expanded to include more than skills, knowledge and experience? What other attributes should be included?

Not only should lived experience be crucial to informing appointment plan decisions, it should also be considered in relation to selection criteria in addition to skills, knowledge and experience (in terms of work and education history).

Lived experience itself could be considered as desirable in some appointments, and any favour for sector¹⁰ or seniority is avoided ([The Lord Holmes Review \(December 2018, 7\)](#)).

Matching assessment methods to the attributes sought (Questions 31-32)

Should the Code be more explicit about the need to match assessment methods to the attributes sought? Why?

Yes.

While **the Code** provides for equality considerations and consistent assessment of applicants' skills, knowledge and experience in D1 and D3, it **should also refer to the Scottish Ministers' duty to ensure reasonable adjustments for applicants to remove or reduce any substantial disadvantage faced by disabled applicants which would not be faced by a non-disabled applicant.**

While, support for 'anyone who reasonably requires help to apply' is included in Annex 2 (6), the term reasonable adjustments refers to the duty in s.20 of the EA 2010.

¹⁰ On page 8 of the [Commissioner's consultation paper](#), in 2019, more public appointments are made of people currently or most recently employed in the public sector (45.8%) than in the private or voluntary sectors, whereas a majority of the Scottish population work in the private sector (78.5%).

This can include changing policies and practices in the selection process, changes to overcome barriers to the physical features of the interview space, and the provision of extra equipment or support (such as easy read application packs and auxiliary aids at interviews) for disabled applicants.

Public bodies should be consistent in notifying applicants about their rights to request reasonable adjustments, and proactive about contacting any applicant who has requested reasonable adjustments in advance of the interview to plan ahead. They should ask applicants what they need rather than make any assumptions based on their disability ([The Lord Holmes Review \(December 2018, 9\)](#)).

Assessments methods also should seek to ensure that information is communicated accessibly to people who do not speak English as a first language. They should also be accessible for people who do not have access to the internet, as an entirely online process may exclude people who are disabled, living in remote, rural areas or those who cannot afford an internet connection.

Issues in the Commissioner's guidance (Question 33)

Please say whether you consider any of these issues (in the Commissioner's guidance) is appropriate to be included in the Code, guidance or inappropriate for either. Please give reasons for the views you express below.

We believe the following issues ([from Appendix Three on page 26 of the consultation paper](#)) should be included in the Code:

'f. Advising that the published start dates for new members may be deferred to take account of maternity.'

Family-friendly public bodies will attract the best talent and avoid the loss of skills and experience which can result from misconceptions and poor practice in relation to pregnant workers and new mothers. This could be further developed by proactively offering flexible and part-time working options.

'i. Setting parameters around the role of recruitment consultants to ensure that applicants who do not apply via this route are not disadvantaged in comparison.'

- This could ensure that head-hunters used by the appointing body operate under its equality obligations

Contacts

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Telephone 0808 800 0082

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Hours 09:00 to 19:00 (Monday to Friday)

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