

**SECTION 1 - DO I NEED AN EIA?****DO I NEED AN EIA?**

<b>Name of policy/activity:</b>  Salary Sacrifice Scheme for Ultra Low Emission Vehicles
Please choose one of the following:  Is this a: <ul style="list-style-type: none"> <li>• New policy/activity</li> <li>• Existing policy/activity? This is a new activity.</li> <li>• Budget proposal/change for this policy/activity?</li> <li>• Pilot programme or project?</li> </ul>

<b>Decision</b> Set out the rationale for deciding whether or not to proceed to an Equality Impact Assessment (EIA)  There are criteria in relation to national minimum wage levels that can prohibit who can take up salary sacrifice schemes. Given the value of cars, it is possible that an increased number of employees will not be able to participate as the payments may take them below national minimum wage levels. The Council has a large proportion of female employees in part time low paid jobs which could result in an indirect negative impact on this group of staff.  <b>Date of Decision:</b>
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**If undertaking an EIA please continue onto the Section 2. If not, pass this signed form to the Equalities Officer.**

**Assessment undertaken by:**

Director or Head of Service	Frances Garrow, Head of HR, ICT and OD
Lead Officer for developing the policy/activity	Anne Smith, Senior OD Adviser
Other people involved in the screening (this may be council staff, partners or others i.e contractor or community)	

## SECTION 2: EQUALITY IMPACT ASSESSMENT

### Brief description of the affected service

<p>1. Describe what the service does:</p> <p>This is provision of a salary sacrifice scheme for eligible employees as part of the employee benefits on offer. HR currently are responsible for salary sacrifice schemes, however there is a crossover with the Climate Change team who are also proposing introducing the same scheme.</p>
<p>2. Who are your main stakeholders?</p> <p>Managers, employees, trade union reps</p>
<p>3. What changes as a result of the proposals? Is the service reduced or removed?</p> <p>An additional salary sacrifice scheme is introduced. There are no service reductions or removals. There are savings on employers' contributions for the organisation.</p>
<p>4. How will this affect your customers?</p> <p>Not all employees are eligible. There are national minimum wage thresholds that cannot be breached which given the value of the cars, may impact more people than the current salary sacrifice schemes for bikes and additional pension contributions.</p> <p>Our analysis in Appendix 1 provides an overview of the scheme parameters and analysis of the impact on our workforce.</p> <p>This analysis shows that the introduction of this scheme would have a negative impact on the Sex protected group. Due to the national minimum wage thresholds, our workforce undertaking roles in Grade 1 – 5 of our 13 tier salary scale would not be eligible to apply. This relates to 72% of our workforce holding part time, full time or relief/casual posts in the council. Of this 72% of the workforce, the gender split is 81% female and 19% male. 90% of the female workers are employed on a part time basis compared to 36% male workers, 10% of female workers are employed full time compared to 64% of male workers. As a result of this gender split there are higher numbers of female workers therefore also impacted as a result of age in that we have higher number of females compared to males within each age bracket however the overall comparison of the age profile is in line with Moray Council overall. This analysis highlights the negative impact on our female workers with regards to this proposal.</p> <p>Appendix 1 provides a full breakdown of the analysis. Please note the council do not hold accurate workforce data as this is provided voluntarily we are unable to fully assess the impact on all the protected groups for this assessment and as such only Sex and Age have been provided in the attached as the other data was too small to be valid.</p>

### 5. Please indicate if these apply to any of the protected characteristics

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Protected groups	Positive impact	Negative impact
Race		
Disability		
Carers (for elderly, disabled or minors)		
Sex		x
Pregnancy and maternity (including breastfeeding)		
Sexual orientation		
Age (include children, young people, midlife and older people)		
Religion, and or belief		
Gender reassignment		
Inequalities arising from socio-economic differences		
Human Rights		

**6. Evidence.** What information have you used to make your assessment?

<b>Performance data</b>	
<b>Internal consultation</b>	Economic Development Service Reps
<b>Consultation with affected groups</b>	
<b>Local statistics</b>	Workforce profiling data
<b>National statistics</b>	
<b>Other</b>	

**7. Evidence gaps**

Do you need additional information in order to complete the information in the previous questions?

We do not hold accurate workforce personal data as currently staff require to volunteer this information so therefore the full impact on the protected groups is not fully known however one of our Equality Outcome actions is to improve the quality of our reporting data to address this.

**8. Mitigating action**

*Can the impact of the proposed policy/activity be mitigated?*

No in that we are unable to offer this benefit to our lower paid employees

Please explain

We are legally required for participants to remain above the National Minimum Wage

## 9. Justification

If nothing can be done to reduce the negative impact(s) but the proposed policy/activity must go ahead, what justification is there to continue with the change?

Operating a low emissions car scheme would improve employee travel carbon footprint by encouraging use of more efficient vehicles and would support the aims of the Council's Climate Change Strategy.

Council would achieve budget savings via the benefit from tax and NI exemptions and there could potentially be savings in mileage reimbursement to employees who move to electric vehicles as the mileage rate for EVs is 5 pence per mile as opposed to 45 pence per mile.

It is a requirement to ensure that participants remain to be paid NMW.

In the current climate this proposal would improve our employee engagement and potentially improve recruitment and retention through a wider employee benefits offering.

Have you considered alternatives?

Yes, however whilst there are other schemes available, they would not benefit from tax and NI exemptions and would therefore not result in any employer savings, albeit they would enhance the overall employee benefits package offered by the Council

## SECTION 3 CONCLUDING THE EIA

## Concluding the EIA

1. No negative impacts on any of the protected groups were found.	
2. Some negative impacts have been identified.  The impacts relate to:	
Reducing discrimination, harassment, victimisation or other conduct prohibited under the Equality Act 2010	x
Promoting equality of opportunity	x
Fostering good relations	x
3. Negative impacts can be mitigated the proposals as outlined in question 8	
4. The negative impacts cannot be fully mitigated but are justified as outlined in question 9.	x
5. It is advised not to go ahead with the proposals.	

**Decision**

Set out the rationale for deciding whether or not to proceed with the proposed actions:

The council is facing significant financial challenges, with savings of £27m to be made in order to develop a sustainable council.

The proposal will allow a savings against NI and Tax exceptions to be made which will contribute towards the overall financial savings to be made.

Operating a low emissions car scheme would improve employee travel carbon footprint by encouraging use of more efficient vehicles and would also support the aims of the Council's Climate Change Strategy.

During a particularly challenging recruitment market, the introduction of this scheme would also enhance the overall employee benefits package offered by the Council. This

type of action would normally have a positive impact on employee engagement, recruitment and retention.

**Date of Decision:**

**Sign off and authorisation:**

<b>Service</b>	
<b>Department</b>	
<b>Policy/activity subject to EIA</b>	
We have completed the equality impact assessment for this policy/activity.	Name: Anne Smith Position: Senior OD Adviser Date:
Authorisation by head of service or director.	Name: Position: Date:
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	