

Equality and Human Rights Commission

Employee

information

and the Public
Sector Equality
Duty

A guide for public authorities
in Scotland

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1 | Introduction

Context for this guide

This guide is one of a series written by the Equality and Human Rights Commission (the Commission) to explain how public authorities can meet the requirements of the Equality Act 2010 (the Act), which harmonises and replaces previous equalities legislation. The Act includes a public sector equality duty which replaced the separate duties relating to race, disability and gender equality. The public sector equality duty came into force on 5 April 2011.

There are eight guides giving advice on the public sector equality duty in Scotland:

1. Essential guide to the public sector equality duty
2. Equality outcomes and the public sector equality duty
3. Evidence and the public sector equality duty
4. Involvement and the public sector equality duty
5. Assessing impact and the public sector equality duty
6. Mainstreaming the equality duty
7. Employee information and the public sector equality duty
8. Board diversity and the public sector equality duty

The Essential guide gives an overview of the requirements of the public sector equality duty.

Legal status of this guide

This guide gives advice on how to meet the public sector equality duty. It will help public authorities to comply with their legal duties under:

- Section 149 of the Equality Act 2010 (the public sector equality duty), and

- The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended.

Aim of this guide

This guide aims to help authorities subject to the public sector equality duty to implement the duty as it relates to employee information. The guide provides more detailed advice to supplement the information set out in the *Essential guide to the public sector equality duty*.

Who this guide is for

This guidance provides advice to two types of public authority: those that are subject only to the public sector equality duty and those that are also subject to the specific duties under the 2012 regulations mentioned above ('listed authorities'). The different requirements for each type of public authority are set out clearly throughout this guide.

The guide is aimed at those responsible for implementing the public sector equality duty in public authorities in Scotland. It will be of interest to staff right across public authorities, but particularly those in charge of gathering and using employee information, as well as those engaged in business planning, procurement, analysis, performance management, human resources, grant making, governance and scrutiny.

The guide will also assist those who have an interest in the work of public authorities such as service users, voluntary bodies, unions, and equality organisations.

Content of this guide

This guide:

- Explains the obligations of listed authorities to gather, use and publish employee information under the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 as amended (the specific duties)
- Explains the purpose of gathering and using employee information and how it relates to the other requirements of the public sector equality duty

- Provides advice on gathering and using employee information, confidentiality issues, and the Data Protection Act
- Advises on deadlines for publishing information and appropriate publication formats.

This guidance is for public authorities in Scotland. Separate guidance on the public sector equality duty is available for public authorities in England (and bodies with non-devolved functions in Scotland and Wales) and public authorities in Wales. These reflect the differences in the specific duties for England and Wales.

This guide was last updated in October 2016. Check our website www.equalityhumanrights.com to see if it has been replaced by a more recent version.

2 | Employee information and the public sector equality duty

The public sector equality duty is here referred to as the 'general equality duty' and is set out in the Equality Act. If you are listed in the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 you are also covered by specific duties, which are designed to help listed authorities meet the general equality duty. Further information on the public sector equality duty can be found in our Essential guide to the public sector equality duty.

The General Equality Duty

The general equality duty requires public authorities, in the exercise of their functions, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
- Advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not.

This guidance refers to these three elements as the three 'needs' mentioned in the general equality duty and so when we discuss the general equality duty we mean all three needs.

The public sector equality duty covers the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The public sector equality duty also covers marriage and civil partnerships, with regard to eliminating unlawful discrimination in employment.

The ban on age discrimination in services and public functions came into effect on 1 October 2012. As the ban does not extend to people under 18 this limits the scope of

the duty to have due regard to the need to eliminate 'unlawful discrimination' under the first aim of the duty (although it does not limit the other two aims).

The Specific Duties

The purpose of the specific duties in Scotland is to help those authorities listed in the Regulations in their performance of the general equality duty.

What the Specific Duties require in terms of employee information

Public authorities covered by the Specific Duties **Duty to gather and use employee information**

The specific duties require each listed authority to take steps to gather information on the composition of the authority's employees (if any) and information on the recruitment, development and retention of people as employees of the authority with respect to, in each year, the number and relevant protected characteristics of such people.

The authority must use this information to better perform the general equality duty.

Each listed authority must also publish a mainstreaming report, on the progress it has made to make the general equality duty integral to the exercise of its functions, so as to better perform that duty.

This report must include an annual breakdown of information gathered by the authority which has not been published previously in such a report on the composition of the authority's employees, as well as the recruitment, development and retention of people as employees of the authority with respect to, in each year, the number and relevant protected characteristics of such people, and details of the progress that the authority has made in gathering and using that information to enable it to better perform the general equality duty.

Need to add the Duty to publish gender pay gap information

A listed authority must publish information on the percentage difference among its employees between men's average hourly pay (excluding overtime) and women's average hourly pay (excluding overtime).

The information published must be based on the most recent data available for a date when the authority had at least 20 employees. No publication is necessary if the authority has not had 20 employees at any point since these regulations came into force or since publication was last due.

The threshold for this Duty changed from 150 to 20, coming into effect between 2016 and 2018 for different listed authorities. Information about the publishing dates for each listed authority can be found at www.equalityhumanrights.com/en/publication-download/public-authorities-scotland-who-covered-specific-duties.

Duty to publish statements on equal pay, etc.

A listed authority is required to publish a statement on equal pay every four years. . The information published must be based on the most recent data available for a date when the authority had at least 20 employees. No publication is necessary if the authority has not had 20 employees at any point since these regulations came into force or since publication was last due.

The threshold for this Duty changed from 150 to 20, coming into effect from 2017 onwards for different listed authorities. Information about the publishing dates for each listed authority can be found at www.equalityhumanrights.com/en/publication-download/public-authorities-scotland-who-covered-specific-duties.

The first statement published by a listed authority must specify its policy on equal pay among its employees between women and men, and information on occupational segregation, being the concentration in particular grades and in particular occupations of women and men.

Subsequent statements on equal pay must specify the listed authorities policy on equal pay among its employees between women and men, and people who are disabled and people who are not, and people who fall into a minority racial group and people who do not.

It is also required to publish information on occupational segregation, being the concentration in particular grades and in particular occupations of women and men, persons who are disabled and people who are not, and people who fall into a minority racial group and persons who do not.

Public authorities covered only by the General Equality Duty

Although there is no specific requirement under the general equality duty to gather employee information, public authorities will still need to ensure that they gather and use enough information on their employees to effectively meet the general equality duty.

A note on terminology

This guidance uses the term ‘policy’ as shorthand for any activity of your organisation. Therefore ‘policy’ should be understood broadly to embrace the full range of your policies, provisions, criteria, functions, practices and activities including the delivery of services – essentially everything you do.

This guidance uses the term ‘equality groups’ to mean ‘persons who share a relevant protected characteristic’, and where reference is made to ‘equality groups and communities’ this includes ‘any person who appears to the authority to represent the interests of those persons’.

3 | Why gather and use employee information?

Ensuring that you have good employee information will help you to:

- Identify key issues in employment
- Assess whether you are discriminating unlawfully in any of your employment functions and help identify action to remedy this
- Identify any actions you can take to avoid discrimination and harassment, advance equality of opportunity or foster good relations
- Understand the impact of your employment policies, practices and decisions on people with different protected characteristics and thereby plan them more effectively
- Consider taking steps to meet the needs of staff and potential staff who share relevant protected characteristics
- Make informed decisions about policies and practices which are based on evidence about the impact of your activities on equality
- Demonstrate to the public and to audit, scrutiny and regulatory bodies how you are performing on equality
- Assess performance against that of similar organisations, nationally or locally.

The specific duties require each listed authority to take steps to gather information on the composition of its employees and on the recruitment, development and retention of people as employees with respect to, in each year, the number and relevant protected characteristics of such persons. These steps will include any that are likely to help the authority gather information on the composition of the authority's employees, including preparatory steps taken in order to encourage a good response to requests for information from employees.

The authority must use the information it gathers to improve its performance in terms of the general equality duty.

For all bodies subject to the general equality duty, gathering and using employee information across all the relevant protected characteristics will be an important part

of demonstrating 'due regard' for the three needs mentioned in the equality duty (see section 2).

We recommend that this guidance is read alongside *Evidence and the public sector equality duty* which provides further information on data categories and advice on monitoring sensitive information.

4 | Who must gather and use employee information?

If you are a listed authority, you must gather employee information and use it to help you better perform the general equality duty.

A listed authority with 20 or more employees must also gather and publish gender pay gap information and a statement on equal pay, as discussed below.

Public authorities covered only by the general equality duty will need to ensure that they gather and use enough information on their employees to effectively meet the general equality duty.

5 | What employee information should you gather?

A listed authority must take steps to gather information on the composition of its workforce and the recruitment, development and retention of its employees, with respect to, in each year, the number and relevant protected characteristics of such persons.

Public sector organisations operate a wide variety of systems and processes for gathering employment data and it will be for each organisation to provide evidence of how they are meeting the requirements of the specific duties on employee information.

We recommend that you work towards gathering and using information disaggregated by protected characteristics on the following:

- Recruitment and promotion
- Numbers of part-time and full-time staff
- Pay and remuneration
- Training and development
- Return to work of women on maternity leave
- Return to work of disabled employees following sick leave relating to their disability
- Appraisals
- Grievances (including about harassment)
- Disciplinary action (including for harassment)
- Dismissals and other reasons for leaving.

All the information listed above must be collected and analysed for all employees, including both full- and part-time employees.

Information about protected characteristics should always be collected and stored securely and separately. You should ensure all personal and sensitive information is

processed in accordance with the Data Protection Act, which would include storing it securely and reporting it in a form which protects anonymity.

Appendix 1 of our guide *Evidence and the public sector equality duty* provides further details about the Data Protection Act and advice on monitoring sensitive information.

If you have only a small number of people working for you, or in a particular workplace or department, you need to be careful about the level of information you collate, to avoid a situation where individuals are identifiable. You may wish to adopt a convention where, for example, an asterisk or other symbol is used to mean 'fewer than 10 people'.

Disability

It is usually unlawful to ask any job applicant about their disability or health until after they have been offered a job. However, for the purposes of equality monitoring you can still ask questions about disability, the answers to which are stored in an anonymous way which is not linked to the application form. Remember that it is important to explain clearly how this information will be processed, as disclosing certain impairments (such as mental health conditions) can be difficult for many people. Further information about the definition of disability can be found in Appendix 1 of the Equality Act 2010 services and employment Codes of Practice.

Collecting sensitive information

Collecting information by routine monitoring through questionnaires or surveys may be the most effective way to gather employee information. Make sure the questionnaire or survey explains clearly how the data will be stored, and who can access it. Ideally, ensure all information gathered is stored anonymously. Further information on good practice in this area can be found on the Information Commissioner's Office website: www.ico.org.uk/for-organisations

It is good practice to make sure that employees are clear about why you are gathering the information and how it will be used. If you are able to demonstrate to your staff that you use this information to improve your performance, then they are more likely to respond.

6 | How to use employee information

A listed authority must **use** the employee information it gathers to better perform the general equality duty.

Employee information may include both quantitative and qualitative data (for example, from a staff group convened to look at flexible working).

You will need to examine the whole of the employment cycle across protected characteristics to help you understand the key equality issues in your workforce.

If a statistical trend emerges in your employee information (for instance, a disproportionate trend towards poorer appraisals for disabled employees) you will need to investigate the reason for this. It may be, for example, that this trend reflects a failure by the authority to ensure that the reasonable adjustments required by disabled staff to do their job are always in place. Identifying the cause will allow you to take appropriate action to address it.

Analysis of your employee information may also lead you to consider positive action. This allows employers to take certain action with 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.

Examples:

- **Analysing performance to focus positive action**

Each year, a large local authority analyses its employee information, examining in particular performance on recruitment and retention, career progression and promotion across its Service Divisions, disaggregated by the protected characteristics for which it has data.

Based on this comparative performance, it works with staff groups to design and implement a tailored positive action programme for staff with protected characteristics who work or who would like to work within the Service Division which is performing least well.

It also runs a programme of work to improve the data it is gathering, using its positive action programmes to promote its use of employee information to staff to encourage a high rate of completion in its employee monitoring.

- **Positive action in police specialist unit**

A police specialist unit which has historically attracted low numbers of female and minority ethnic officers works with particular staff groups to understand some of the reasons behind this imbalance. It develops a successful programme of positive action, which includes the renewal of equipment and facilities, the introduction of familiarisation days and a mentoring system.

Further guidance concerning positive action can be found in our Employment Code of Practice, available at: www.equalityhumanrights.com

You may find that focusing on particular issues in employment means that you will have to consider the appropriate level and detail of monitoring you require in order to meet the duty. This means taking account of four factors:

- The importance of the policy or employment issue which you need to monitor
- The kind of monitoring you need
- Whether the information you need is already available from other sources
- How easy or difficult it will be to obtain complete information.

As a starting point, focus on the data you hold currently, and consider what more you need to gain a full picture of the issue. Look for the key gaps in relation to what you need to monitor.

Remember that the employment monitoring information you collect should be proportionate to the size of your organisation and you should only gather information

that you need and are going to use. Also consider at an early stage how you will store the information securely and for how long.

An authority's approach may develop over time, with more data being collected and used as the authority and its employees become more familiar with monitoring.

Putting employee information into context

You may find it useful to refer to other sources to help you contextualise the employee information you have gathered. As well as helping to identify and fill employee information gaps, involving equality groups and communities (including your own employees) can also help you to interpret information. Obtaining qualitative information through involvement may help you to establish if there are any differences between how you think you are performing and the experience of equality groups. Please see our guide *Involvement and the public sector equality duty* for more information.

National research on equality issues can help you to interpret your own employee information and can provide a useful steer on the context of key issues. Many bodies publish national surveys or thematic reviews that can also assist you. Individual scrutiny reports may identify issues affecting protected groups and make recommendations about how to address these challenges.

Appendix 2 of our guide *Evidence and the public sector equality duty* includes some selected sources of evidence.

7 | What employee information should you publish?

Publication of employee information

Publishing employee information will enable service users, staff, regulators and other interested parties to assess the equality performance of your organisation. It will help you explain how and why you have reached certain conclusions and made certain decisions. It will provide a clear picture of how you have complied with the general equality duty and will make your decision-making more transparent.

A listed authority is required to take steps to gather information on the composition of its workforce and on the recruitment, development and retention of employees with respect to relevant protected characteristics.

It must use this information to better perform the general equality duty.

As stated above, the authority must publish a report on progress made in mainstreaming the equality duty; this report must include (if not published previously) an annual breakdown of the information the authority has gathered and details of the progress it has made in gathering and using information to enable it to better perform the general equality duty. Please see our guide *Mainstreaming the equality duty* for more information.

Publication of gender pay gap information and statement on equal pay

A listed authority is required to publish information every two years on the percentage difference, among its employees, between men's average hourly pay (excluding overtime) and women's average hourly pay (excluding overtime).

The information published must be based on the most recent data available for a date when the authority had at least 20 employees (for some authorities 150

employees: see below). No publication is necessary if the authority has not had 20 employees at any point since the regulations came into force or since publication was last due.

The threshold for this Duty changed from 150 to 20, coming into effect between 2016 and 2018 for different listed authorities. Information about the effective dates for each listed authority can be found [here](#).

A listed authority is also required to publish a statement on equal pay every four years. The information published must be based on the most recent data available for a date when the authority had at least 20 employees (as noted above, 150 for some). No publication is necessary if the authority has not had 20 employees at any point since these regulations came into force or since publication was last due.

The threshold for this Duty changed from 150 to 20, coming into effect from 2017 onwards for different listed authorities. Information about the effective dates for each listed authority can be found [here](#).

Although the specific duties do not require you to provide contextual information, your information will be more accessible if you point out any key trends, or if you provide a short narrative to introduce the information that you publish.

As authorities work towards gathering and using information disaggregated by protected characteristics across the employment cycle, we recommend that you also consider publishing:

- The race, disability, sex and age distribution of your workforce at different grades, and whether they are full- or part-time employees
- An indication of the likely representation in terms of sexual orientation and religion and belief, provided that no individuals can be identified as a result
- An indication of any issues for transsexual staff, based on involvement of transsexual staff or equality organisations
- Details and feedback from involvement with staff and trade unions
- Quantitative and qualitative research with employees, e.g. staff surveys
- Records of how you have shown due regard to the needs of the duty in decision-making concerning employment in your organisation, including any assessments of impact on equality and any evidence used
- Details of policies and programmes that have been put in place to address equality concerns raised by staff and trade unions.

8 | Gender pay gap information

Purpose of the equal pay provisions of the Equality Act 2010

The full-time gender pay gap has narrowed since 1975 when equal pay legislation first came into force, but in 2011 there remained a gap of 10.7 per cent between women's and men's pay in Scotland, down from 12 per cent in 2010. There are several ways of measuring the pay gap, but this figure is the average (or mean) gender pay gap between full-time employees' earnings in Scotland, excluding overtime. The hourly pay gap is bigger if women working part-time are included.

Historically, women have often been paid less than men for doing the same or equivalent work and this inequality has persisted in some areas.

The Equality Act 2010 gives women (and men) a right to equal pay for equal work. It requires that women and men are paid on equally favourable terms where they are employed on 'like work' or 'work rated as equivalent' or 'work of equal value'.

It replaced previous legislation, including the Equal Pay Act 1970 and the Sex Discrimination Act 1975, and the equality provisions in the Pensions Act 1995.

The Act's provisions on equal pay and sex discrimination are intended to ensure that pay and other employment terms are determined without sex discrimination or bias.

Further information on equal pay is available on the Commission's website:

Code of Practice on Equal Pay: www.equalityhumanrights.com/en/publication-download/equal-pay-statutory-code-practice

Equal pay information and tool kit: www.equalityhumanrights.com/en/multipage-guide/equal-pay-audit-larger-organisations

The specific duties on equal pay are not intended to replace an authority's obligations on equal pay under the Equality Act 2010 to address pay differences between men and women, but rather to supplement these obligations.

A listed authority is required to publish information every two years on the percentage difference, among its employees, between men's average hourly pay (excluding overtime) and women's average hourly pay (excluding overtime).

The information published must be based on the most recent data available for a date when the authority had at least 20 employees. No publication is necessary if the authority has not had 20 employees at any point since these regulations came into force or since publication was last due .

The threshold for this Duty changed from 150 to 20, coming into effect between 2016 and 2018 for different listed authorities. Information about the effective dates for each listed authority can be found [here](#).

The gender pay gap information required by the duty is the percentage difference between men's average hourly pay (excluding overtime) and women's average hourly pay (excluding overtime).

Both mean (average) and median calculations help to illuminate different aspects of gender pay gap information, although a much greater level of detail will be required to support any practical activity to address pay gaps.

9 | Statement on equal pay

The three main causes of the pay gap between women and men are occupational segregation, a lack of flexible working opportunities, and discrimination in pay and grading structures. All of these factors which underpin the pay gap can be addressed, to some degree, by an authority's own employment policies and practices.

Unequal pay is not limited to sex. Pay gaps by disability are often the product of direct discrimination, e.g. making assumptions about disabled people's capabilities or educational background, and/or indirect discrimination, e.g. performance pay criteria that are not linked to productivity, such as the requirement to work long hours.

Belonging to a minority racial group can also bring pay disadvantage. Again, the causes of such disadvantage can be linked to direct and indirect discrimination. In terms of race, unequal pay can be caused by a wide variety of factors including making assumptions about a person's capabilities or cultural background, non-recognition of foreign qualifications or unjustifiable language restrictions.

In order to help address these systemic problems, a listed authority is now required to publish a statement on equal pay which must specify its equal pay policy and specify information on occupational segregation among its employees.

In the first statement on equal pay a listed authority published has to specify its policy on equal pay as regards women and men, and information on occupational segregation, which is the concentration in particular grades and in particular occupations of women and men.

Subsequently, every fourth year, a listed authority is required to publish its statement on equal pay, which must specify its policy on equal pay as regards women and men; people who are disabled and those who are not; and people who fall into a minority racial group and those who do not. It is also required to publish information on occupational segregation, which is the concentration in particular grades and in particular occupations of women and men; people who are disabled and those who are not; and people who fall into a minority racial group and those who do not.

A listed authority should already have started to prepare for the requirements in relation to these groups, to ensure that it can publish the full equal pay statement that is required four years after the publication of the first equal pay statement.

An equal pay statement gives you the opportunity to set out your intention to deliver equal pay, and develop steps towards achieving this.

In your equal pay statement you are required to publish your policy on equal pay and information on occupational segregation. Your policy might include the following:

- A commitment that the organisation will carry out an equal pay review or audit
- A commitment to monitor pay regularly in partnership with trade unions or employee representatives
- Your objectives on equal pay
- Actions which you will take
- A named senior manager who will be responsible for the policy's implementation
- A commitment that the organisation will apply appropriate resources to achieve equal pay.

Occupational segregation

Scottish Ministers decided in June 2009 that tackling occupational segregation were priorities in working towards equality of opportunity between women and men.

The specific duty requires that your equal pay statement includes information about occupational segregation. Occupational segregation refers to the differences in the distribution of women and men, disabled and non-disabled people and people from different minority racial groups across different occupational categories and job types. Labour market statistics show that, for example, women and men work in different jobs, predominate in particular sectors and, indeed, are channelled into different jobs as a cause and consequence of a combination of factors, such as stereotyping, discrimination, individual and social and educational expectation, a lack of flexible working, and caring responsibilities.

Occupational segregation can be 'horizontal', where those with certain protected characteristics are clustered into specific job types, or 'vertical', where they are clustered into specific positions within organisations and may be largely absent from senior management and executive positions.

An analysis of occupational segregation is the first step towards being able to prioritise and take actions to address particular issues within your own organisation.

This may take the form of targeted positive action, for example where BME staff are encouraged to apply for jobs in an area in which they are underrepresented.

Although the specific duties only require you to publish information on occupational segregation for disability, sex and race, it is essential that public authorities understand the effect of their employment policies and practices on staff, in order to meet the general duty. In meeting the general equality duty, public authorities may choose to gather and consider evidence and publish information on occupational segregation across all protected groups.

Equal pay audits

An effective way to identify pay gaps, for example between the genders, is by undertaking an equal pay audit for gender. This is not required by the specific duties, but it may help you demonstrate that you have shown due regard to the need to eliminate gender pay discrimination. Over 40 per cent of public bodies across Britain already audit their pay systems for sex bias.¹ Equal pay audits can also be used to assess discriminatory pay gaps for other protected characteristics, such as race or disability.

Listed bodies with fewer than 20 employees and bodies that are only subject to the general equality duty are not required to publish gender pay gap information or a statement on equal pay. However, these bodies may choose to publish this information in order to help them meet the general equality duty.

¹ *Equal Pay Reviews Survey 2008*, Lorna Adams, Peter Hall and Stefan Schafer, Equality and Human Rights Commission Research Report.

10 | How to publish employee information

The specific duties require that you must publish employee information in your report on progress in mainstreaming the general equality duty.

The information required in this report is an annual breakdown of information gathered by the authority (which has not been published previously), on the recruitment, development and retention of employees with respect to the number and relevant protected characteristics of such persons. The report must also include details of the progress the authority has made in gathering and using that information to enable it to better perform the general equality duty.

The authority must publish employee information in its report on progress on mainstreaming the general equality duty, every two years. It must publish information on its gender pay gap every two years and publish its equal pay statement every four years.

Mainstreaming reports should be published at intervals of not more than two years.. A listed authority may choose to report more frequently, say on an annual basis.

When you publish employee information, gender pay gap information and equal pay statements, you must publish in a manner that is accessible to the public using an existing means of public performance reporting, so far as this is practicable.

Linking your employee information reporting to existing public performance reporting systems will help reduce the reporting burden by directly providing audit, scrutiny and regulatory bodies with the material they require. Where systems do not exist, you are free to decide how best to publish so long as the information is accessible to the public.

There are a number of places where you can publish, for example in your annual report or in a dedicated equality report on your website. If you use a website you should ensure that the report is easy to find. You will also have to consider whether the data can be put in a format that is compatible with the system's accessibility features, which provide screen reading facilities for people with sight or physical mobility impairments.

Regardless of where it is published, your employee information should be presented in such a way as to enable all who have an interest to access it readily.

Further information

Further advice, including the requirements of the Data Protection Act, can be found in Appendix 1 of our guide *Evidence and the public sector equality duty*.

There is additional guidance on gathering statistical information on equality groups in our Employment Code of Practice, available at: www.equalityhumanrights.com

Contacts

This publication and related equality and human rights resources are available from the Commission's website (www.equalityhumanrights.com).

For advice, information or guidance on equality, discrimination or human rights issues, please contact the Equality Advisory and Support Service, a free and independent service.

Website	www.equalityadvisoryservice.com
Telephone	0808 800 0082
Textphone	0808 800 0084
Hours	09:00 to 20:00 (Monday to Friday) 10:00 to 14:00 (Saturday)
Post	FREEPOST Equality Advisory Support Service FPN4431

Questions and comments regarding this publication may be addressed to scotland@equalityhumanrights.com. The Commission welcomes your feedback

What formats are available?

This guide is available as a PDF file and as a Microsoft Word file from www.equalityhumanrights.com. For information on accessing a Commission publication in an alternative format, please contact: scotland@equalityhumanrights.com.

© 2016 Equality and Human Rights Commission

ISBN 978-1-84206-547-1 First published 2014. Last updated October 2016.

You can download this publication from

www.equalityhumanrights.com

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Published: July 2016