

Equality and Human Rights Impact Assessment Publication Document

This template summarises the key decisions/actions taken in the EHRIA, and has been separated from the full EHRIA document for publication on the SPS external website in compliance with statutory requirements.

Background

Title of the	Switchover from paper to electronic pay slips and P60s		
Policy			
EHRIA Lead	Head of HR Central Services		
Person			
Date EHRIA	27/11/2015		
completed			
Review date	March 2016		
and frequency			
Is this a new or	New 🛛		
revised			
policy/practice?	Revised 🛛		

Scoping

What are the aims of this policy/practice?	To introduce on-line payslips for Scottish Prison	
	Service employees	
WHO did you consult with?	Trades Union Side	
	Scottish Prison Service Equality & Diversity Team	
	Scottish Prison Service Staff Networks	
WHAT did you learn?	Both supportive, Equality and Diversity provided	
	advice on how we could ensure everybody	
	continues to have access to their payslips, in	
	particular disabled staff and staff on	
	maternity/paternity/parental/adoption leave or long-	
	term sickness absence.	
HOW will this shape your policy/practice?	Paper payslips will be offered as a reasonable	
	adjustment to those who have a disability which	
	makes the electronic payslip unsuitable. The	
	guidance will be checked to ensure it in line with	
	Scottish Accessible Information Forum guidance.	
What quantitative and/or qualitative	Equal Opportunities information stored in our	
evidence as well as case law relating to	Human Resources data base, to identify the range	
equality and human rights have you	of disabilities that may exist across the staffing	
considered when deciding to develop		
	group.	
new or revise current policy/practice?	. Staff naturalize including INSPIRE the Dischility	
	• Staff networks, including INSPIRE, the Disability	
	staff network, were involved in user testing of the	
	system.	
	Office for National Obstication data along its that	
	Office for National Statistics data showing that	
	only 1% of 16 to 44 year olds, 4% of 45-54 year	

Scoping	
	olds and 8% of 55 to 64 year olds never use the internet. 84% of households now having internet access and that figure is rising at a rate of approximately 3% a year. Access to the Internet using a mobile phone more than doubled between 2010 and 2014, from 24% to 58%
	• In May 2015 Ofcom advised that in 2011 only 2% of UK households owned a tablet computer but by earlier this year the majority of households owned a tablet computer.
	• While there is a legal requirement to provide employees with pay details and end of year P60's,this does not specify that the information must be provided in paper format. According to HMRC, electronic P60's are now acceptable to them and they do not require TYE details to be provided in paper format. However, should an individuals need exist whereby paper copies are required, arrangements for such will be made.

Impact Will the impact and outcomes of the new/revised policy/practice:

Contribute to eliminating	POSITIVE:	
discrimination, harassment and	It will contribute to eliminating discrimination,	
victimisation?	harassment, victimisation	
E.g.		
Raise awareness of our SPS	NO EFFECT:	
vision and values for equality and diversity	It will have no effect on discrimination, harassment and victimisation \square	
 Challenge appropriately any behaviours or procedures which do not value diversity and advance equality of opportunity 	NEGATIVE: It will make discrimination, harassment and victimisation worse	
Advance equality of opportunity	POSITIVE:	
between those who share a protected	It will advance equality of opportunity $oxtimes$	
characteristic and those who do not?	NO EFFECT:	
E.g.Remove or minimise disadvantage	It will have no effect on equality of opportunity \Box	
Meet the needs of equality groups	NEGATIVE:	
that are different from the needs of others participation in public life	It will reduce equality of opportunity \Box	

Impact

Will the impact and outcomes of the new/revised policy/practice:

Foster good relations between those who share a protected characteristic and those who do	POSITIVE: It will foster good relations
not? E.g. ●Tackle prejudice	NO EFFECT: It will have no effect on good relations ⊠
 Promote understanding 	NEGATIVE:
	It will cause good relations to deteriorate \Box
Ensure Human Rights Compliance?	It will uphold human rights articles. 🖂
	It will breach human rights articles. \Box

Please summarise the results of the Equality & Human Rights Impact Assessment, including the likely impact of the proposed policy/practice advancing equality and human rights.

Positive Impacts

Protected characteristics affected: Age, Disability, Gender Identity, Maternity and Pregnancy, Human Rights Compliance

Staff will be able to view their payslips at a time and place that suits them. At present someone who only works a couple of days a week may need to wait until they are back at work to collect their payslip. This particularly affects staff who work part-time, who are predominantly women and men over 55 years.

Staff on maternity/paternity/sick leave will also be able to see their pay details at the same time as other staff, at present they need to wait for their payslip to be sent out by their local HR Department.

Staff with visual impairments / dyslexia will be able to access their pay details on screen which will be larger and therefore clearer than the current pay slip size or through other assistive technology.

There is also a benefit for people who are reassigning their gender as the current paper payslips have individuals' titles which may not correspond with individuals' reassigned gender. Even if this information does not change on the online system, at least the individual will have their privacy better protected than having paper payslips being processed by many people.

The new system will enhance individuals Right to Private Life as information will be securely stored and made available to them beyond their employment for a limited period of time.

Negative Impacts				
Protected characteristics affected:				
Impact	Mitigation			
Whilst it has not been an issue in testing with the staff network, it is possible that individuals with disabilities may find using a computer, tablet or phone to view their pay details to be more difficult than the paper payslip.	A print off of the payslip can be produced by the employee, or, a paper payslip providing the same information as is currently provided will remain an option for any individual requiring such due to their disability			
Whilst it is unlikely to be an issue, staff could be absent from work due to maternity leave or disability related absence and not have access to the internet.	SPS will provide paper statements			
The 2011 evidence shows that people from 41% of people from the most deprived areas in Scotland do not have the internet in their home.	They can access iPayview at work or from a public library			

Recommended course of action	
Outcome 1 : Proceed – no potential for unlawful discrimination or adverse impact or breach of human rights articles has been identified.	
Outcome 2: Proceed with adjustments to remove barriers identified for	
discrimination, advancement of equality of opportunity and fostering good relations or breach of human rights articles.	\boxtimes
Outcome 3 : Continue despite having identified some potential for adverse impact or missed opportunity to advance equality and human rights (justification to be clearly set out).	
Outcome 4 : Stop and rethink as actual or potential unlawful discrimination or breach of human rights articles has been identified.	

Summary of Outcome decision and Recommendations

The iPayview system is tried, tested and well-embedded by many other companies and Government departments in the provision of pay information for staff. An individual can run off a copy of the on line pay information and furthermore, the current paper payslip format can still be provided for individuals who, due to a disability, require such. In any instances of neither of these provisions meeting an individual's needs, alternative solutions will be sought, consultation with the individual concerned and a community based disability support group if required. It is recommended that the iPayview system be provided to staff and where any alternative due to disability is required, an alternative solution is implemented.

Next steps

Review take-up rate of online payslips and analyse failures to access the system. Review support calls logged with IT Service Desk. Discuss with TUS any feedback from their members about the new system.

Next steps

Issues will be recorded and examined for introducing improvements and addressing any matters relating to protected characteristics on a case by case basis.

If you require this document in an alternative format, please contact SPSEqualityandDiversityTeam@sps.pnn.gov.uk