

# Integrated Equality Impact Assessment (IEIA)

## Equality Impact Assessment, Island Community Impact Assessment and Children’s Rights and Wellbeing Impact Assessment

Prior to starting the Integrated Equality Impact Assessment (IEIA) we highly recommend that you complete (or review) the Integrated Equality Impact Assessment learning on the Academy. This provides a general overview of the IEIA process, as well as important information regarding our responsibilities regarding the completion and publication of IEIAs.

Other sources of guidance, general evidence, support and learning are available on the [Equality Evidence Hub](#) on Connect, which includes the Equality Evidence Review created by Evaluation and Research. This also includes a Frequently Asked Questions, which addresses initial questions about the IEIA. If something is underlined, but not a link, you can hover over the wording for a definition or additional information.

Please note, that while the IEIA form is long, it does include three previously separate impact assessments and significantly more guidance. You may not need to complete every impact assessment within the IEIA. If you have any questions, please email [ieia@sds.co.uk](mailto:ieia@sds.co.uk).

More detailed external guidance for each of the individual impact assessments can be found below:

[Equality and Human Rights Commission Guidance for Equality Impact Assessments in Scotland](#)

[Scottish Government Guidance for Children's Rights and Wellbeing Impact Assessments](#)

[Scottish Government Guidance for Island Community Impact Assessments](#)

### 1.0 Project Overview

This document uses the term ‘project’ to describe the full range of our policies, provisions, projects, functions, practices and activities including the delivery of services – essentially everything we do that affects people.

Title of Impact Assessment

Modern Slavery Policy

Name of Senior Responsible Officer

Stacy McDonald, Head of Procurement

Does this project relate to any other published [EQIAs](#) or [ICIAs](#)?

Additional guidance

Not Applicable

Please provide an overview of your project including the names of any external partners and whether it is a new project. Consider the key objectives of the project.

Additional guidance

The purpose of the Modern Slavery Policy is to inform all those who work at SDS about the risk of Modern Slavery in our supply chains and how we can mitigate risk. The target audience is SDS staff.

This policy is made in conjuncture with our external ‘Modern Slavery Statement’ which is made in voluntary compliance with the provisions of section 54(1) of the Modern Slavery Act 2015.

In relation to this assessment, the Procurement & Legal team have aimed to ensure that the language of the Modern Slavery Policy is accessible and digestible.

### 2.0 Gathering Evidence and Assessing Impact

It is important to remember our responsibilities regarding the Public Sector Equality Duty when completing this section. The starting point for assessing impact is the three needs of the Public Sector Equality Duty: ensuring that the project does not discriminate unlawfully; considering how the project might better advance equality of opportunity; and considering whether the project will affect good relations between different groups.

Guidance for 2.0

In Gathering Evidence and Assessing Impact you need to go through each of the characteristics in turn and address the following points.

- Provide Context – outlining how your project relates to this protected characteristic, such as population statistics. The [Equality Evidence Hub](#) is a good place to start looking for relevant evidence. The Equality Evidence Hub is a space on Connect to access relevant guidance for the IEIA and a range of equality evidence, both internal and external.

- **Additional Questions-** Some sections have additional questions, please ensure that you answer these appropriately. They are in reference to our reporting responsibilities for Children’s Rights and Wellbeing and Island Communities.
- **Impact**– Outline the potential disadvantage or barriers, as well as positive impacts, faced by this equality group in relation to this project. Cite evidence sources used, including consultation. Where a gap in evidence is observed, please note within this section.
- **Action**– Outline what we have already done to address disadvantage or promote equality, as well as what we’ll do to proactively promote equality and address any potential barriers raised in Evidence, including evidence gaps.

Please note that consultation is a requirement of Island Communities Impact Assessment and considered good practice in relation to Equality and Children’s Rights and Wellbeing Impact Assessments.

## 2.1 Age

### Guidance for 2.1

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
<p>The Modern Slavery Policy is equipped to provide all SDS employees regardless of age the knowledge required to understand and report on any aspects of Modern Slavery and in particular this could be in relation to child labour in our supply chains.</p> <p>Young people are more at risk of exploitation because of their age and lack of experience making them vulnerable</p> <p>No specific consultation. However, regular updates on supply chains and any report to International Labour Organisation</p> <p>Evidence from Unseen Helpline Annual Assessment <a href="https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf">https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf</a></p>	<p>Activity to date:</p> <ul style="list-style-type: none"><li>- Best Practice Guidance Note(BPGN) and webinar for SDS colleagues on Modern Slavery</li><li>- Modern Slavery Statement</li><li>- Modern Slavery Policy</li></ul> <p>Further activity required:</p> <p>BPGN and webinar update due April 2026 and will be made mandatory for all SDS colleagues</p> <p>Modern Slavery Policy update due to be published April 2026</p>

## 2.2 Children's Rights and Wellbeing

### See guidance for 2.2

Context:  
Not Applicable

Additional Questions:

Does this project impact on children and young people up to the age of 18?

☐ Yes    ☒ No    ☐ Don’t Know

If you have answered no to the question above, you do not need to complete the Children’s Rights and Wellbeing section of this form but please provide some justification for your decision below.

Which articles of the United Nations Convention on the Rights of the Child (**UNCRC**) does this project impact on?  
See [further guidance](#) for this question

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)

2.3 Care Experience

See guidance for 2.3

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
Evidence of risks associated with children in care or who are care experienced.  Higher risk of children going missing with lack of care and appropriate accommodation, with unregulated accommodation adding to the risk of exploitation  <a href="https://www.ecpat.org.uk/Handlers/Download.ashx?IDMF=23b51868-f257-49bc-b779-a5059bd65a04">https://www.ecpat.org.uk/Handlers/Download.ashx?IDMF=23b51868-f257-49bc-b779-a5059bd65a04</a>	

2.4 Disability

See guidance for 2.4

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
<p>The Modern Slavery Policy is equipped to provide all SDS employees regardless of disability the knowledge required to understand and report on any aspects of Modern Slavery and in particular this could be in relation to child labour in our supply chains.</p> <p>Young people are more at risk of exploitation because of their age and lack of experience making them vulnerable.</p> <p>No specific consultation. However, regular updates on supply chains and any report to International Labour Organisation</p> <p>Evidence from Unseen Helpline Annual Assessment <a href="https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf">https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf</a></p>	<p>Activity to date:</p> <ul style="list-style-type: none"><li>- Best Practice Guidance Note(BPGN) and webinar for SDS colleagues on Modern Slavery</li><li>- Modern Slavery Statement</li><li>- Modern Slavery Policy</li></ul> <p>Further activity required:</p> <ul style="list-style-type: none"><li>- BPGN and webinar update due April 2026 and will be made mandatory for all SDS colleagues</li><li>- Modern Slavery Policy update due to be published April 2026</li></ul>

2.5 Gender Reassignment

See guidance for 2.5

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
As above in relation to Modern Slavery for Transgender	

2.6 Marriage/Civil Partnership

See guidance for 2.6

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
As above in relation to those in modern slavery – SDS employees have the knowledge to report on anyone found to be in slavery conditions and includes forced marriage	

2.7 Pregnancy and Maternity

See guidance for 2.7

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
As above in relation to those pregnant or supposedly on maternity leave	

2.8 Race

Guidance for 2.8

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
As above in relation to modern slavery for all Race/nationality/ethnicity could be a potential for sexual exploitation Evidence from Unseen Helpline Annual Assessment - providing the Nationalities of potential victims <a href="https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf">https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf</a>	Activity to date: <ul style="list-style-type: none"><li>- Best Practice Guidance Note(BPGN) and webinar for SDS colleagues on Modern Slavery</li><li>- Modern Slavery Statement</li><li>- Modern Slavery Policy</li></ul> Further activity required: <ul style="list-style-type: none"><li>- BPGN and webinar update due April 2026 and will be made mandatory for all SDS colleagues</li></ul> Modern Slavery Policy update due to be published April 2026


2.9 Religion or Belief

See guidance for 2.9

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
As above in relation to religion or belief	

2.10 Sex

See guidance for 2.10

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
<p>As above in relation to gender</p> <p>The demographics of potential victims indicated show the diversity of those caught up in situations of modern slavery with Males continuing to be the most prevalent gender indicated</p> <p>Evidence from Unseen Helpline Annual Assessment <a href="https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf">https://www.unseenuk.org/wp-content/uploads/2022/04/Unseen-Helpline-Annual-Assessment_2021-FINAL.pdf</a></p>	<p>Activity to date:</p> <ul style="list-style-type: none"> <li>- Best Practice Guidance Note(BPGN) and webinar for SDS colleagues on Modern Slavery</li> <li>- Modern Slavery Statement</li> <li>- Modern Slavery Policy</li> </ul> <p>Further activity required:</p> <ul style="list-style-type: none"> <li>- BPGN and webinar update due April 2026 and will be made mandatory for all SDS colleagues</li> </ul> <p>Modern Slavery Policy update due to be published April 2026</p>

2.11 Sexual Orientation

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
As above in relation to sexual orientation	

2.12 Poverty

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)

2.13 Island Communities

Context:

Additional Questions:

Does this project include, deliver or impact on [Island Communities](#) ?

☐ Yes      ☒ No

Is this a project, which is likely to have an impact an island community which is significantly different from its effect on other communities (including other island communities) in the area?

☐ Yes      ☐ No      ☐ Don't know

If you have answered no to the two questions above, you do not need to complete any further questions in the Island Communities section of this form but please provide some justification for your decision below.

What island community concerns are you already aware of?

Does the existing data for Island Communities differ between [islands](#)?

Are there any existing design features or mitigations in place? If yes, please describe

If you are consulting, is your consultation robust, meaningful, and demonstrating that SDS has regard for island communities when carrying out its functions?

Guidance

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)

Please complete the following questions after the impact assessment above.

Does the evidence show any different circumstances, expectations, needs, experiences or outcomes (such as levels of satisfaction or participation)?  
☐ Yes      ☐ No

Are these different effects likely?  
☐ Yes      ☐ No

Are these effects significantly different?  
☐ Yes      ☐ No

Could the effect amount to disadvantage for an island community compared to the mainland or between other groups?  
☐ Yes      ☐ No

If the answer is no to all of the above, please provide justification for not completing the full ICIA below.



If the answer is yes to any of the above, complete the Full Island Community Impact Assessment below before submitting the form for publication

Full Island Community Impact Assessment

Assess the extent to which you consider that the project can be developed or delivered in such a manner as to improve or mitigate any resulting outcomes for island communities.

Consider alternative delivery mechanisms and whether further consultation is required.

Describe how these delivery mechanisms will improve/mitigate outcomes for island communities?

Identify resources required to improve/mitigate outcomes for island communities.

Should delivery mechanisms/mitigations vary in different communities?

Do you need to consult with island communities in respect of mechanisms or mitigations?

Have island circumstances been factored into the evaluation process?

Have any island-specific indicators/targets been identified that require monitoring?

How will outcomes be measured on the islands?

How has the project affected island communities?

How will lessons learned in this ICIA inform future project making and service delivery?

2.14 Rural Communities

See guidance for 2.14

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)
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2.15 Other

See guidance for 2.15

Context:

Impact (Does this project have a negative, positive or no impact? Please include the evidence of why that is, citing appropriate sources)	Action (What activity have you done already and what was the impact? What do you need to do to address the evidence?)

2.16 Consultation Recording

Consultation is an excellent source of evidence and can offer insight that cannot be gathered in any other way. It is important to be well prepared when consulting with partners, ensuring you do not take too much of their time and that you efficiently gather the information you need. However, it is also easy to over consult with our partners, so sharing key learning is important to mitigate that risk. It is also important to inform your consultees about changes that have been made (or not made) based on their input. Please use this space to share key learning from your consultations and how you have fed back to the consultees.

Further information on our National Approach to Equality Stakeholders can be found [here](#).

Focal Point Groups can also be useful for consultations, further information can be found [here](#).

See guidance for 2.16

Stakeholder(s) consulted	Key feedback from stakeholder(s)	What changes were made based on the feedback? (if none, explain why)	How was this fed back to stakeholders? (including date provided)


3.0 Action Plan

A key part of every impact assessment is the action plan. This is where you state the actions that you will take in response to the impact assessment you have completed. The actions should be specific, measurable, achievable, relevant and timebound (SMART).

Once the IEIA has been signed off by the SRO, actions within the Action Plan should be added to the relevant team’s Continuous Improvement Action Plan.

See guidance for 3.0

What is the action you will take in response to the impact assessment?	Which characteristics/groups does it apply to?	What is the intended impact?	When will this be completed?
Ensure modern Slavery Policy accessible	All groups	The policy is readable/accessible, and translations would be available on request	April 2026
Ensure modern slavery training is mandatory for all SDS staff	All groups	To ensure staff all understand the policy and the rise to individuals across society	April 2026
Ensuring training highlights groups most at risk	Age/Race and Sex(gender)	To ensure staff all understand the policy and the rise to individuals across society	April 2026
Ensure Modern Slavery Policy is available to be translated in sign language as required	All groups		

4.0 Approval and Publication

- Will you be making this IEIA available in different formats/languages?

Guidance

SRO (Print)	SRO Signature	Date	Review Date
STACY MCDONALD	<i>Stacy McDonald.</i>	16/06/2025	To be reviewed on a quarterly basis. Next review September 2025

**5.0 Review (To be completed at the review date, not at the same time it is submitted)**

This section should be completed as part of the review on the date listed above under the sign off.

**Guidance for 5.0**

**Were the actions taken completed? If not, why not?**

**Did the actions achieve what they intended? If not, why not?**

**What actions would you continue/stop or reconsider for future projects?**

**Has any evidence been identified that may be useful for similar future projects?**

**If this is a review for an ongoing project, are there any additional actions to add to the project going forward?**