



Forestry and
Land Scotland
Coilltearachd agus
Fearann Alba

Equality Impact Assessment: Fleet and Business Travel Initiatives – Outsourcing Driver Licence Checks

1. Key details

Details	Response
Directorate and Team	Net Zero – Project Team / MES
Title of policy project or decision	Fleet and Business Travel Initiatives – outsourcing of driver licence checks
Senior Responsible Owner (Pay Band 2 or higher)	Mark Wilcock, Head of Fleet and Buildings Mark.Wilcock@forestryandland.gov.scot
Lead assessor writing this EQIA	Anna Grant, Project Support Officer
Other contributors	Elinor Meggs, Project Manager Tommy Groat, Head of Mechanical Engineering Policy and Projects
Date EQIA research started	27/06/25
When will this policy or project begin (estimated)?	October 2025
Who will be affected? Tick all that apply.	☒ FLS staff ☐ FLS contractors ☐ The public ☐ Other specific groups (give details):

2. Summary of the policy, project or decision.

This project workstream will see the procurement via framework agreement of an external company, Safe2Drive, to complete driver licence checks on behalf of FLS. Currently these are completed by admin teams, and there is inconsistency and lack of capacity across regions and national teams to ensure all drivers have completed their checks. If drivers use their personal vehicles for work purposes, Safe2Drive will also carry out grey fleet checks to ensure drivers are compliant with road tax, MOT expiry, insurance and breakdown cover. Grey fleet are privately owned vehicles used for business purposes.

The introduction of external resource to complete the checks will mean FLS will be compliant with Health and Safety requirements as all staff who are driving for work will have up-to-date driver licence checks in place. It is also expected that drivers, line managers and cost centre managers will understand their responsibilities with this change of process. This workstream will also reduce the admin burden of chasing for checks and paperwork, allowing resource to be more quickly reassigned to other areas where it is needed.

There will therefore be assurance that all staff who drive for work are safe and legal to do so – there will be a defined percentage of staff with checks in place in e.g. 3 months, 6 months and 12 months.

3. FLS workforce and comparative data

FLS workforce equalities insights

These are equalities insights from our mainstreaming report 2023-25. Where possible, use these to inform your policy or project.

- **Our workforce diversity is increasing gradually. However, FLS remains unrepresentative of Scottish working age population**, and is less diverse than some comparative employers (Forestry Commission, Scottish Government Core, Nature Scot.) A more diverse workforce supports innovation and our future sustainability.
- **Sex:** We need to recruit and retain **more women across the whole workforce, and particularly into leadership** (pay bands 2 and higher). We need to address **high occupational segregation**. Women are underrepresented in regional, technical roles e.g. harvesting, wildlife rangers, craftspersons. Women are overrepresented in national, admin and corporate services roles.
- **Age:** We need to recruit and retain **more staff under 30**. This is critical for a sustainable workforce and succession planning. Many staff will retire soon, taking skills and knowledge with them. We need to continue to support apprenticeships, work-based learning, mentoring and coaching, and recruitment outreach to schools and colleges.
- **Disability and neurodiversity:** We need to recruit and retain more disabled staff. We offer the Scottish Government employee passport policy and the Disability Confident accreditation. Anecdotally, we have high rates of neurodiversity. Some of our roles require physical activity and ability to drive - however, many roles don't. Notably, Scottish Government Core workforce has nearly three times more disabled employees than FLS. We can do more to promote FLS as a disability and neurodiversity friendly employer.

- **Race:** We need to recruit and retain more ethnic minority staff. Many of our roles are in rural areas with low ethnic diversity, while Scotland's central belt and cities are more ethnically diverse. However, many of our current staff live in Edinburgh, Glasgow or Aberdeen, work from home, or travel to remote locations. Geography is not the only barrier, and we can do more to recruit and retain ethnic minority staff.
- **Sexual orientation and gender reassignment:** information sharing is low for these groups. Notably, Scottish Government Core has three times as many LGB employees as FLS. We can do more to promote FLS as an LGBTQ+ inclusive employer.
- We need to encourage staff to share their diversity data in our HR system. We have particularly low reporting for religion, sexual orientation and gender reassignment.

Equality Act 2010 Protected Characteristic	FLS workforce data March 2025 Source: <u>Mainstreaming report 2023-25</u>	Comparisons: <u>Scottish census 2022</u> <u>Scottish Government Employee Data Packs 2022</u>
Age	66% of staff are over forty. 10% of staff under 30.	27% Scottish working age population under 30. 15% Scottish Government Core workforce under 30 (2022). <u>57% of Forestry Commission employees over 40 (2024).</u>
Disability	5% of staff are disabled. 7% of staff did not share information. We do not capture data on sub-categories of disability. Anecdotally many FLS staff report that they, or their colleagues, are neurodivergent.	22% Scottish working age population are disabled (2022 census). 14% Scottish Government Core workforce disabled (2022). <u>7% Forestry Commission whole workforce disabled (2024).</u> Land and agriculture workforce known to have above average rates of neurodiversity: <u>BBC Radio 4 - On Your Farm, Great Minds Don't Think Alike: Neurodiversity in Farming: "15%, of the general population are believed to be neurodivergent..... In farming communities, research suggests it could be as many as 30%".</u>
Gender reassignment (transgender and non-binary people)	The number of transgender or non-binary staff are too small to report. However, 30% of staff gave no information.	0.44% of people in Scotland aged 16+ are transgender or had trans history <u>(2022 census)</u> . Using People Survey declaration data, Scottish Government Core estimate 0.41% of their staff are transgender/other (2022).

Equality Act 2010 Protected Characteristic	FLS workforce data March 2025 Source: <u>Mainstreaming report 2023-25</u>	Comparisons: <u>Scottish census 2022</u> <u>Scottish Government Employee Data Packs 2022</u>
Marriage and civil partnership	48% of staff are married or in a civil partnership.	
Pregnancy and maternity	32 staff (under 3%) took maternity leave from April 2023-March 2025.	
Race	1.44% of staff are minority ethnicity. 5% of staff did not share this information.	8% Scottish working age population are minority ethnicity (2022). 4% Scottish Government Core workforce are minority ethnicity (2022). <u>7% of Forestry Commission workforce are of minority ethnicity</u> , of which 4% were non white minorities (2024) (note this includes Forestry England's workforce; England is more ethnically diverse than Scotland.)
Religion or belief	44% of staff did not share this information. 40% have no religion, are atheist or agnostic. 7% are Church of Scotland, 2.5% Roman Catholic, 5% other Christian. 2% are other world religions.	Scottish Census 2022: 51.1% of people had no religion, up from 36.7% in 2011. 20.4% responded 'Church of Scotland'. The next largest religious groups were 'Roman Catholic' (13.3%), 'Other Christian' (5.1%) and 'Muslim' (2.2%).
Sex	Female staff increased 33% in March 2021 to 34% in March 2025.	Scottish working age population is 51% female (2022). Scottish Government Core workforce is 56.50% female (2022).

Equality Act 2010 Protected Characteristic	FLS workforce data March 2025 Source: <u>Mainstreaming report 2023-25</u>	Comparisons: <u>Scottish census 2022</u> <u>Scottish Government Employee Data Packs 2022</u>
	Female staff in leadership decreased from 31% in 2022 to 20% in 2025. We have high occupational segregation: certain roles are predominantly held by men or by women. From a January 2025 analysis: 5% wildlife rangers are female. 10% craftspersons are female. 88% of admin jobs are female. Land management, fleet and buildings, and digital services are most male dominated. FLS Corporate Office, and the Planning and Environment team, have the narrowest gender balance. Corporate Services functions - People Team, Finance, Communications – and our Commercial Contract Management team – are most female dominated.	<u>NatureScot’s workforce is 58.90% female (2023).</u> <u>Forestry Commission whole workforce is 47% female, and 41% in senior management (although the exact grade is not specified). (2024).</u>

Equality Act 2010 Protected Characteristic	FLS workforce data March 2025 Source: <u>Mainstreaming report 2023-25</u>	Comparisons: <u>Scottish census 2022</u> <u>Scottish Government Employee Data Packs 2022</u>
Sexual orientation	Over 3% of staff shared that they are lesbian, gay or bisexual (an increase from 2021, when numbers too small to allow reporting). 4% of staff choose 'prefer not to say', 37% gave no information, 56% are heterosexual.	5% Scottish working age population are LGB+ (2022). 9% Scottish Government Core workforce are LGB+ (2022)

4. Research process

Safe2Drive's documents from the beginning of the procurement process were reviewed. This included the following: an accessibility statement which covers accessible and non-accessible content in their website and app; e-declaration process documents for driver licence checks and grey fleet checks which outline how data is processed; their Data Protection Impact Assessment which show how they meet GDPR principles; a pricing document listing the services provided; and a service definition document outlining client onboarding and offboarding.

Stakeholder engagement has been undertaken with the HR team and FTUS, as there is representation from both on the Programme Board. The Project Lead has also been working with both teams on the draft policy for the new process, and HR and FTUS will be consulted for approval.

Previous EQIAs for initiatives within Fleet and Buildings were reviewed to consider potential impacts on different groups for this workstream.

The EQIA was shared with Alison Forbes, the EDI Advisor, for review in July 2025.

HR were consulted for up-to-date workforce demographic data in FLS as of June 2025. Any data that has changed from the workforce data above as of March has been included below.

5. Research findings by characteristic.

Equality Act Protected Characteristic	Your research findings
Age	
Disability	5.7% of staff are disabled. (HR data, June 2025) Safe2Drive's Accessibility Statement details how their website and app are accessible. It also has information on non-compliance with accessibility regulations, which may impact people with disabilities. This is covered in more detail in the impact assessment below.
Gender reassignment	Safe2Drive's DPIA information (p4) states that their admin team can update and amend personal information, when necessary, such as a change of name or title. This would be in accordance with a renewal of the 'Fair Processing Declaration' if FLS informs Safe2Drive.
Marriage and civil partnership	Safe2Drive's DPIA information (p4) states that their admin team can update and amend personal information, when necessary, such as a married name or title. This would be in accordance with a renewal of the 'Fair Processing Declaration' if FLS informs Safe2Drive.
Pregnancy and maternity	
Race	1.5% of staff are minority ethnic. 92.4% of staff are white. 6% of staff gave no information. (HR data, June 2025) Safe2Drive's E-Declaration Process details the process for checking UK licences, Northern Irish Driving Licences and Foreign Driving Licences.
Religion or belief	41% of staff are atheist, agnostic or have no religion. 42% of staff did not share this information. 7% are Church of Scotland and 8% are other Christian. 2% are other world religions. (HR data, June 2025).

Equality Act Protected Characteristic	Your research findings
Sex	65% of staff are male, 35% of staff are female. (HR data, June 2025)
Sexual orientation	
Cross cutting themes	

6. Your impact assessment

Guidance

You now need to assess if there is potential negative or positive impact for each characteristic (or no impact).

The Public Sector Equality Duty requires due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation (can you prevent negative impact?)
- advance equality of opportunity between people who share a protected characteristic and those who do not (can you promote positive impact?)
- foster good relations between people who share a protected characteristic and those who do not (can you promote positive impact?)

Prompts to help you consider potential impact by characteristic

Age	Ageism: Stereotypes about who is 'too old' or 'too young' for training jobs or skills Pensions Retirement
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	Affordability of housing and higher education Intersection with disability: mobility, digital literacy and with sex (bias against older women)
Disability	Access to Work Ableism bias and stereotypes Visible and invisible Physical and mental health Reasonable adjustments Social model and medical models of disability Neurodiversity Accessibility of buildings, forests, toilets, websites, work events and meetings
Gender reassignment	Privacy: potential for 'outing' someone Transphobia Transgender and non-binary identities Toilets and changing rooms Pronouns
Marriage and civil partnership	Pensions Death in service and other benefits Intersection with sexual orientation: Could heteronormative assumptions lead to exclusion or discomfort?
Pregnancy and maternity	Fertility treatment Miscarriage Risk assessments for pregnant staff Breastfeeding and milk expressing spaces Return to work Keep in touch days maternity policy hiring maternity cover Part time working
Race	Racism Harassment Stereotypes Skin colour ethnicity nationality Diversity in urban and rural Scotland Intersection with religion or belief

Religion or belief	Religious holidays and observances Religious dress Non-religious beliefs are also covered: climate change A belief must also be worthy of respect in a democratic society and not affect other people's fundamental rights for example environmentalism – beliefs related to the need to tackle climate change and protect the environment, and gender critical beliefs – the belief that a person cannot change their sex – are protected.
Sex	Sexual harassment Sexism Stereotypes Women's health: Menopause Menstruation Toilets, changing, welfare units Work equipment and clothing – suitable for all types of bodies?
Sexual orientation	Homophobia, biphobia Is the policy inclusive of lesbian, gay, and bisexual people? Could heteronormative assumptions lead to exclusion or discomfort? Are services and communications inclusive of diverse relationships?

Protected Characteristic	Possible negative impact	Possible positive impact	No impact	Commentary: Explain your assessment choice. How will you mitigate potential negative impact? How will you promote and secure potential positive impact?
Age	☒	☐	☐	Intersection with digital literacy – there may be staff with lower digital confidence who struggle to use a new system. For drivers completing grey fleet checks, they will need to load documents onto the system which will either require IT knowledge or assistance from someone. Training documents and FAQs will be provided by the supplier so staff feel confident in adopting the new process. There will also be a feedback loop integrated into the change

Protected Characteristic	Possible negative impact	Possible positive impact	No impact	Commentary: Explain your assessment choice. How will you mitigate potential negative impact? How will you promote and secure potential positive impact?
				management plan so people can ask questions on the new process which haven't already been covered by comms, guidance and FAQs.
Disability	☒	☐	☐	Safe2Drive have provided an extensive accessibility statement which applies to the app and website. The website has been tested against and is partially compliant with the WCAG 2.2 standard, which was last tested on 3rd February 2025. Users can: change colours, contrast levels and fonts; zoom in up to 400% in areas of the website; navigate most of the website using a keyboard or speech recognition software; listen to most of the website using a screen reader. There are still some restrictions which may affect someone with a disability: there is a limitation on magnification as the top navigation bar is fixed; users cannot modify the line height or spacing of a text; most older PDF documents are not fully accessible to screen reader software; you cannot skip to the main content when using a screen reader; there's a limit to how far you can magnify the map on the 'contact us' page because of the header; some images do not have a text alternative, so people using a screen reader cannot access the information. If disabled members of staff are unable to use the system, there will be an alternative process for completing driver licence checks internally.

Protected Characteristic	Possible negative impact	Possible positive impact	No impact	Commentary: Explain your assessment choice. How will you mitigate potential negative impact? How will you promote and secure potential positive impact?
Gender reassignment	☒	☐	☐	Staff members who change their name due to gender reassignment can inform the Mechanical Engineering Services (MES) Admin Team in FLS who can ask the Safe2Drive administration team to change their personal data on the portal. If staff members change their driving licence details and their title is changed they will need to advise this. FLS staff can also contact Safe2Drive directly to change this information or change it themselves on the Safe2Drive app. There is the potential to out someone if their driving licence information doesn't match that given to FLS. The MES Admin staff will have completed Data Protection e-learning so they will have knowledge of processing personal data. The Safe2Drive Admin Team are also trained in Data Protection.
Marriage and civil partnership	☐	☐	☒	Note: you only need to consider this characteristic in relation to 'eliminating discrimination' (first part of the public sector equality duty). It is not considered that the project would have an impact on people due to their marital or civil partnership status. Staff members who change their name due to marriage, civil partnership or divorce can inform the MES Admin Team in FLS who can ask the Safe2Drive administration team to change their personal data on the portal information.

Protected Characteristic	Possible negative impact	Possible positive impact	No impact	Commentary: Explain your assessment choice. How will you mitigate potential negative impact? How will you promote and secure potential positive impact?
				FLS staff can also contact Safe2Drive directly to change this information or change it themselves on the Safe2Drive app. The MES Admin staff will have completed Data Protection e-learning so they will have knowledge of processing personal data. The Safe2Drive Admin Team are also trained in Data Protection.
Pregnancy and maternity	☐	☐	☒	It is not considered that the project would have an impact on staff members who are pregnant or in the maternity period.
Race	☐	☐	☒	It is not considered that the contract would have an impact on people due to their race (including ethnicity, colour or national origin). Safe2Drive have processes in place to carry out the checks whether the driver has a British licence or not. If someone has a Northern Irish driving licence, a manual submission and data processing by Safe2Drive's team will be required.
Religion or belief	☐	☐	☒	It is not considered that the project would have an impact on people due to their religion/belief or non-belief.
Sex	☐	☐	☒	It is not considered that the project would have an impact on people due to their sex/gender.
Sexual orientation	☐	☐	☒	It is not considered that the project would have an impact on people due to their sexual orientation.

7. Decision approval and monitoring

Details	Response
What was the outcome of this assessment? Check all that apply.	☐ No changes needed. ☒ Mitigation agreed to prevent negative impact. ☐ Actions agreed to promote and secure positive impact.
If specific mitigations or other actions were agreed, please give full details.	Mitigations were agreed for three of the protected characteristics: age, disability and gender. Age – To ensure the new process is accessible for everyone regardless of levels of digital literacy, there will be comprehensive guidance documents provided by the Project Team. Safe2Drive have already supplied some process documents and FAQs, which the Project Team will build upon to make more detailed and include any internal processes for FLS staff. This includes screenshots of the different steps and information/documents which drivers need to provide. There will also be FAQs which outline the responsibility that drivers and managers have, the differences between the new process and the current process, and give a point of contact if they have any additional questions or feedback.

Details	Response
	Disability – Whilst Safe2Drive have outlined the accessibility features on their website and app, there are still restrictions which may affect someone with a disability e.g. not everything can be accessed using the screen reader. If these restrictions were to prevent someone from being able to follow the new process, an internal alternative process would be available to ensure they were still compliant with the checks. Gender reassignment / Marriage and civil partnership – These protected characteristics may both be impacted by having to share details of a change in name or title. FLS staff can change these details via the MES Admin Team or through Safe2Drive directly, minimising the number of people who will process the data. Any admin staff involved in data processing have all been trained in Data Protection, so understand what personal data is and how this is processed.
How will ongoing equalities impacts, positive or negative be monitored?	1. Key performance indicators will be established which will measure service delivery and productivity and they will be used to ensure that the overall impact of introducing the change can be monitored. • The implementation of the change will be closely monitored by the Contract Manager and Regional Business Managers during the first 12 months using the

Details	Response
Will this EQIA need a future review – when?	KPIs which will be established. This will inform any remedial actions if required. Any impacts positive or negative will be shared with the trade unions 2. Performance will be analysed to ensure the policy is fit for practice. The data will be analysed in order to ensure that the agreed process has been followed. 3. This document will be reviewed after 3 months and then annually. Any issues will be highlighted and the Equality & Diversity Manager advised. The contract with the supplier, Safe2Drive, will run for three years. The EQIA will be reviewed in line with the contract renewal.
Signed off by Director  Graeme Hutton	Director Net Zero, 25th November 2025

Details	Response
'I am satisfied with this equality impact assessment and authorise its publication on Forestry and Land Scotland's website.'	