Equality Impact Assessment

Summary

Name of Policy or practice	Paternity		
New Policy or Revision	Revised		
Policy Owner (role)	Head of Human Resources		
Date Policy Owner Confirmed Completion	November 2024		
Agreed Schedule Review Date	October 2027	Additional review date (Action review date)	

Action Plan

This section is completed at the end of the Equality Impact Assessment. Due to the importance of embedding equality in SQA through our actions the Action Plan will be the focus and record of ongoing actions.

Explain how you will monitor and record the actual impact on equality groups, including how the evidence can be revisited to measure the actual impact.

Required Actions	Owner	Date	Comment & Review

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
SQA will consider the collection of	SQA treats this as a	Reward Advisor,		Collation of care experience
care experience data to determine	protected characteristic	People Reward &		data will be considered post
any disproportionate impact on this	under our Corporate	Equalities and		move to the new organisation
priority group	Parenting duty and	Data Analyst,		post Autumn 2025
priority group	recognises that this is	People Analytics,		
	not covered by the	Governance &		
	Equality Act 2010.	Systems		

Policy Aims

What is the rationale for this policy or practice?

This policy sets out to inform staff of their paternity rights and explains the internal process to be followed for those that are eligible. The policy has been developed in line with the Paternity and Adoption Leave Regulations 2002 and the Paternity and Adoption Leave (Adoption from Overseas) Regulations 2003.

What evidence is there to support the implementation or development of this policy or practice?

The policy is developed in line with legislation explained here: <u>Paternity pay and leave: Overview - GOV.UK (www.gov.uk)</u> and has been reviewed against the Advisory, Conciliation and Arbitration Service (ACAS) guide on paternity leave and rights here: <u>Checking you can get paternity leave</u>: <u>Your paternity leave</u>, <u>pay and other rights - Acas</u>.

We ultimately conclude that the policy closely reflects the ACAS guidelines and covers SQA's statutory obligations.

As a general point, the linked statutory legislation referred to in the policy needs to be reviewed at regular intervals to check it is up to date.

The policy has a predominately internal focus and is written from the 1_{st} person point of view to help access what is sometimes complex information. The policy is part of a suite of seven other separate related 'leave' policies and will, we understand, be accessed on SQA's intranet under a general policy heading.

What are the aims of this policy or practice?

The policy recognises that when raising a family, individuals have a statutory right to time off work (paid and unpaid).

The policy also aims to ensure easily found appropriate information about time off work for paternity leave is available. There is a stated link to valuing employees and supporting time off for parental responsibilities.

The policy itself is divided in two discrete sections:

Policy Structure:

- 1: Part A Policy detail.
- 2: Part B Procedures for SQA employees to follow.

The following SQA policies are also related to the *Paternity* policy:

- Adoption
- Compassionate leave
- Flexible Working
- Maternity
- Shared Parental Leave

How is the content of these aims relevant to equality groups?

Lesbian, gay, bisexual, transgender and other sexual identities (LGBT+) Parents:

We researched externally and noted that now more than ever LGBT+ couples are adopting in the UK.

https://www.gov.uk/government/news/record-number-of-children-adopted-by-lgbt-families

The numbers of same-sex couple families have increased substantially in recent years with an increase of 53.2% from 152,000 in 2015 to 232,000 in 2018. We do feel this policy clearly defines from the outset, that paternity leave not only applies to a child's biological father, but it also applies to the mother's civil partner or partner or to one of a couple jointly adopting and this is regardless of gender as long as they have (or expect to have) responsibility for the child's upbringing.

Wording changed within the eligibility section to having a baby, adopting a child, having a baby through a surrogacy arrangement as per suggestion from EMRG

Evidence, Consultation and Engagement

What stakeholders have you engaged with in the development of this policy or practice?

This policy has been developed in consultation with SQA's recognised Trades Unions, Unite and Unison, and in line with SQA's Recognition Agreement.

In addition, as this is an internal policy, SQA has asked for feedback from internal employee network groups in relation to equality impacts groups. These employee network groups include:

- ACE (Appreciate Culture and Ethnicity) Network.
- SQA Disability Network.
- SQA Rainbow Network.
- Women's Network.

Evidence of Stakeholder Engagement:

Evidence of all meeting minutes, actions and consultation undertaken with the PRG group (including Equality considerations in respect of all policies, activities and functions) is detailed on a dedicated SQA shared resources site.

What evidence about equality groups do you have to support this assessment?

Age

Table 1.1: Age

Age bracket	2019 no	2019 %	2020 no	2020 %	2021 no	2021 %	2022 no	2022 %	Variance no	Variance %
16–24	59	6.32%	50	5.27%	49	4.93%	36	3.47%	-23	-2.85%
25–29	65	6.97%	60	6.32%	73	7.35%	105	10.14%	40	3.17%
30–34	123	13.18%	109	11.49%	96	9.67%	95	9.17%	-28	-4.01%
35–39	131	14.04%	145	15.28%	146	14.70%	144	13.90%	13	-0.14%
40–44	129	13.83%	135	14.23%	146	14.70%	150	14.48%	21	0.65%
45–49	116	12.43%	105	11.06%	113	11.38%	124	11.97%	8	-0.46%
50-54	125	13.40%	141	14.86%	131	13.19%	126	12.16%	1	-1.24%
55–59	119	12.75%	117	12.33%	122	12.29%	122	11.78%	3	-0.98%
60–64	53	5.68%	72	7.59%	81	8.16%	102	9.85%	49	4.16%
65+	13	1.39%	15	1.58%	36	3.63%	32	3.09%	19	1.70%
Total	933	100.00%	949	100.00%	993	100.00%	1036	100.00%	103	11.04%

Table 1.1 shows the age profile of the organisation from 2019 to 2022

Source: SQA Workforce Equality Monitoring Report 2021-23

Equalities: SQA workforce monitoring report 2021-23

Disability

Table 3.1: Disability

Table 3.1. Disability	,									
Disability	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %	Variance number	Variance %
No	417	44.69%	651	68.60%	683	68.78%	697	67.28%	280	22.59%
Not Specified	444	47.59%	152	16.02%	152	15.31%	184	17.76%	-260	-29.83%
Prefer not to say	21	2.25%	68	7.17%	76	7.65%	72	6.95%	51	4.70%
Yes	51	5.47%	78	8.22%	82	8.26%	83	8.01%	32	2.54%
Total	933	100.00%	949	100.00%	993	100.00%	1036	100.00%	103	0.00%

Source: SQA Workforce Equality Monitoring Report 2021-23

Equalities: SQA workforce monitoring report 2021-23

Table 3.1 shows the composition of the disability self-reporting categories for the period from 2019 to 2022.

Of those staff who have declared a disability, females made up 58.54% (2021) and 53.01% (2022) of the population, and males 41.46% (2021) and 46.99% (2022). Due to the low number of staff declaring a disability within SQA we are unable to publish further intersectional data in relation to disability and other protected characteristics.

Race

Table 7.1: Race

Ethnicity	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
African, Scottish African or British African	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	<5	<0.48%
Asian, Scottish Asian or British Asian	13	1.39%	20	2.11%	24	2.42%	25	2.41%
Caribbean or Black	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Mixed or multiple ethnic group	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Not specified	383	41.05%	123	12.96%	101	10.17%	122	11.78%
Other ethnic group	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Prefer not to say	10	1.07%	33	3.48%	34	3.42%	30	2.90%
White	523	56.06%	763	80.40%	825	83.08%	849	81.95%

Source: SQA Workforce Equality Monitoring Report 2021-23

Equalities: SQA workforce monitoring report 2021-23

Table 7.1 shows the ethnic minority background of staff within the organisation for the period from 2019 to 2022

Just under 3.50% staff declared they were from an ethnic minority background in both 2021 (3.32%) and 2022 (3.38%). However, it is encouraging to note that the percentage of staff declaring they are from an ethnic minority background has increased overall by 3.97% between 2019 and 2022. The percentage of staff within each ethnic minority category has remained relatively stable over the last three years.

Religion or Belief

Table 8.1: Religion or belief

Religion or belief	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
Another religion or body	< 5	< 0.54%	< 5	< 0.53%	6	0.60%	6	0.58%
Buddhist	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Church of Scotland	91	9.75%	122	12.86%	127	12.79%	125	12.07%
Hindu	< 5	< 0.54%	< 5	< 0.53%	7	0.70%	8	0.77%
Jewish	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Muslim	7	0.75%	11	1.16%	10	1.01%	11	1.06%
None	286	30.65%	421	44.36%	462	46.53%	489	47.20%
Not specified	405	43.41%	126	13.28%	102	10.27%	123	11.87%
Other Christian	26	2.79%	43	4.53%	44	4.43%	44	4.25%
Prefer not to say	35	3.75%	98	10.33%	103	10.37%	103	9.94%
Roman Catholic	76	8.15%	118	12.43%	129	12.99%	123	11.87%
Sikh	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%

Table 8.1 shows the religion, belief or non-belief status of staff within the organisation for the period from 2019 to 2022.

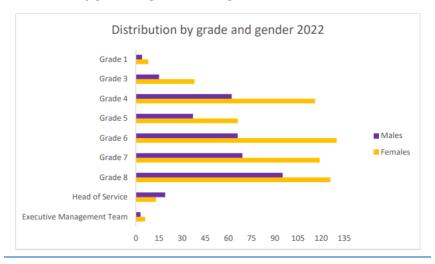
Source: SQA Workforce Equality Monitoring Report 2021-23

Equalities: SQA workforce monitoring report 2021-23

Sex

Gender

Distribution by grade and gender of SQA grade 1 – EMT



Source: SQA Summary of Equal Pay Audit 2023

Scottish Qualifications Authority (sqa.org.uk)

The majority of the 2.9 million lone-parent families in 2022 were headed by a lone mother (2.5 million, 84%) Source: https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2022

59% of unpaid carers are women (Census 2021). Women are more likely to become carers and to provide more hours of unpaid care than men. More women than men provide high intensity care at ages when they would expect to be in paid work (Petrillo and Bennett, 2022)

Source: Carers UK

There are 1.25 million sandwich carers in the UK. These are people caring for an older relative as well as bringing up a family. 68% (850,743) are women.

Source: https://www.ageuk.org.uk/our-impact/campaigning/care-in-crisis/breaking-point-report/

Sexual		Table 10.1: Sexual orient	ation									
Orientation		Sexual Orientation	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%		
		Bisexual	9	0.96%	12	1.26%	15	1.51%	16	1.54%		
		Gay man	13	1.39%	20	2.11%	21	2.11%	23	2.22%		
		Gay woman / lesbian	9	0.96%	10	1.05%	12	1.21%	12	1.16%		
		Heterosexual / straight	431	46.20%	670	70.60%	700	70.49%	702	67.76%		
		In another way	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%		
		Not specified	< 5	< 0.54%	< 5	< 0.53%	156	15.71%	189	18.24%		
		Not sure	26	2.79%	76	8.01%	< 5	< 0.50%	< 5	< 0.48%		
		Prefer not to say	443	47.48%	158	16.65%	84	8.46%	88	8.49%		
		Table 10.1 shows the composition of staff sexual orientation within the organisation for the period 2019 to 2022. Source: SQA Workforce Equality Monitoring Report 2021-23 Equalities: SQA workforce monitoring report 2021-23										
Gender Re- assignment (Gender identity and transgender)		Due to the low number of staff reporting as transgender or describing their gender identity 'in another way', we are unable publish further data in relation to gender reassignment or gender identity. This data is, however, monitored internally.										

Marriage/Civil Partnership

Table 5.1: Relationship status

Relationship status	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %
Civil Partnership	7	0.75%	7	0.74%	8	0.81%	9	0.87%
Co-habiting/in a relationship	80	8.57%	112	11.80%	122	12.29%	122	11.78%
Divorced/Dissolved Civil Partnership	14	1.50%	16	1.69%	17	1.71%	19	1.83%
Married	265	28.40%	370	38.99%	425	42.80%	416	40.15%
Married/Civil Partnership	8	0.86%	12	1.26%	14	1.41%	16	1.54%
Not Specified	407	43.62%	179	18.86%	102	10.27%	127	12.26%
Other	< 5	< 0.54%	< 5	< 0.53%	7	0.70%	9	0.87%
Prefer not to say	18	1.93%	49	5.16%	55	5.54%	59	5.69%
Separated	6	0.64%	12	1.26%	12	1.21%	13	1.25%
Single	122	13.08%	183	19.28%	224	22.56%	239	23.07%
Widowed/surviving partner from Civil Partnership	< 5	< 0.54%	6	0.63%	7	0.70%	7	0.68%

Table 5.1 shows the marriage and civil partnership status of staff within the organisation for the period from 2019 to 2022.

Source: SQA Workforce Equality Monitoring Report 2021-23

Equalities: SQA workforce monitoring report 2021-23

Pregnancy / Maternity

Table 6.1: Pregnancy and maternity

Pregnancy and maternity	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %
Contract ended as planned					1	3.33%		0.00%
Due to return to work					0	0.00%	11	40.00%
Resigned					0	0.00%	1	4.00%
Returned to work	20	100.00%	10	100.00%	29	96.67%	14	56.00%
Total	20	100.00%	10	100.00%	30	100.00%	26	100.00%

	Table 6.1 details the number of staff who have taken maternity leave, whether they are still on maternity leave (due to return to work), have returned to work following maternity leave, resigned following maternity leave, or their fixed-term contract ended (contract ended as planned).
	Source: SQA Workforce Equality Monitoring Report 2021-23 Equalities: SQA workforce monitoring report 2021-23
Care experience (where relevant)	SQA does not currently collect Care Experience data.

Impact and Opportunities for Action

The impact that a policy or practice has on an equality group may be different and this requires to be recorded. The impact may not always be negative. Actions are taken to address any differential impact, and include actions to mitigate against any negative impact, to advance equality and to foster good relations between groups.

Each section contains questions for each equality group. These questions are here to support consideration; however, you can provide further detail. Focus initially on the equality groups that would be affected by this policy. If you do not consider that certain equality groups would be affected by this policy, you may leave these sections.

Protected Characteristic	General Equality Duty							
Age	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010							
	This policy details the entitlements and process to be followed for any employee who is applying for paternity leave and pay. This policy should therefore have a positive impact on people all ages as the policy clearly defines the links to external legislative requirements and internal processes to be followed.							
	The Paternity policy can be accessed by all SQA colleagues regardless of age. SQA records paternity leave internally by Age, but this data is not published externally due to low numbers. (5 SQA employees took paternity leave during 2023.)							
	Conclusion: Probable positive impact							
	Advance equality of opportunity							
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for those in different age groups.							
	Foster good relations							
	There is no specific evidence within the policy to indicate how it fosters good relations between people who share / do not share 'Protected Characteristics'.							

Protected Characteristic	General Equality Duty
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	This policy details the entitlements and process to be followed for any employee who is applying for paternity leave and pay. This policy should therefore have a positive impact on all employees as the policy clearly defines the links to external legislative requirements and internal processes to be followed.
	The Paternity policy can be accessed by all SQA colleagues regardless as to whether they are disabled/not disabled,
	SQA records paternity leave internally by Disability status, but this data is not published externally due to low numbers. (A total of 5 SQA employees took paternity leave during 2023.)
	Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for disabled and non-disabled employees.
	Foster good relations
	SQA's Disability network have an overall remit to:
	1: Promote and enhance disability equality in SQA
	2: Position SQA as an inclusive employer of choice that welcomes, embraces and celebrates the contribution of a diverse workforce
	SQA are also a Disability Confident employer so continued promotion and engagement with the objectives of the scheme is also essential in continuing to foster good relations between employees who are disabled / not disabled.

Protected Characteristic	General Equality Duty
Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	This policy details the entitlements and process to be followed for any employee who is applying for paternity leave and pay. This policy should therefore have a positive impact on all employees – irrespective of <i>Race/ Ethnicity</i> as the policy clearly defines the links to external legislative requirements and internal processes to be followed. The Paternity policy can be accessed by all SQA colleagues regardless of Race / Ethnicity,
	SQA records paternity leave internally by Race / Ethnicity, but this data is not published externally due to low numbers. (A total of 5 SQA employees took paternity leave during 2023.)
	Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for employees of different races/ethnicities.
	Foster good relations
	The ACE Network exists to foster good relations, provide support, create an overall sense of belonging that may not exist elsewhere in the organisation. It also exists with the aim of sharing experiences, providing feedback and recommendations as to how SQA can promote a more diverse and inclusive workplace.
Protected Characteristic	General Equality Duty

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Religion or Belief	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	ACI 2010
	This policy details the entitlements and process to be followed for any employee who is applying for paternity leave and pay. This policy should therefore have a positive impact on all employees as the policy clearly defines the links to external legislative requirements and internal processes to be followed.
	The Paternity policy can be accessed by all SQA colleagues regardless of Religion / Belief,
	SQA records paternity leave internally by Religion / Belief, but this data is not published externally due to low numbers. (A total of 5 SQA employees took paternity leave during 2023.)
	Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for employees of different Religions/ Beliefs.
	Foster good relations
	Y The state of the
	The ACE Network exists to foster good relations, provide support, create an overall sense of belonging that may not exist elsewhere in the organisation. It also exists with the aim of sharing experiences, providing feedback and recommendations as to how SQA can promote a more diverse and inclusive workplace.
Protected	General Equality Duty
Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	This policy details the entitlements and process to be followed for any employee who is applying for paternity leave and pay. This policy should therefore have a positive impact on all employees – irrespective of Sex as the policy clearly defines the links to external legislative requirements and internal processes to be followed. The Paternity policy can be accessed by all SQA colleagues regardless of their Sex,
	The factority policy can be accessed by all own colleagues regardless of their oen,

	SQA records paternity leave by Sex internally, but this data is not published externally due to low numbers. (A total of 5 SQA employees took paternity leave during 2023.) Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for employees of different Sexes.
	Foster good relations
	In SQA the Women's network 'provides a welcoming space for women across the organisation. Through open meetings and events there are opportunities to get to know one another, offer and receive support, and influence SQA policy development in areas of equality and inclusion.
Protected Characteristic	General Equality Duty
Sexual Orientation	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	In 2024, the policy wording in Section 3.1 (Eligibility) has been updated to ensure consistent wording is used with the Maternity and Paternity policy and removing the term "biological mother" which removes the need to state "the criteria apply to male and female employees":
	to be eligible for paternity leave an employee must:
	having a baby
	adopting a child
	having a baby through a surrogacy arrangement

	have been continuously applicated by us for 26 weaks or more by the and of the 45th weak before the weak in
	 have been continuously employed by us for 26 weeks or more by the end of the 15th week before the week in which the child is due to be born or, in respect of an adopted child, as at the end of the 15th week before the
	week in which the child's adopter was notified of having been matched with the child
	Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for LGBT+ employees.
	Foster good relations
	The Rainbow Network is SQA's LGBT+ colleague network. They are 'part of a vibrant global movement for change made up of LGBT+ people and our allies.
	'We play a pivotal role in making sure that SQA is a workplace that embraces LGBT+ diversity and inclusion'.
Protected Characteristic	General Equality Duty
Gender Re- assignment	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
(Gender identity and transgender	This policy details the entitlements and process to be followed for any employee who is applying for paternity leave and pay.
	This policy should therefore have a positive impact on all employees as the policy clearly defines the links to external legislative requirements and internal processes to be followed.
	The Paternity policy can be accessed by all SQA colleagues regardless of their Gender Identity.
	SQA records paternity leave by Gender Identity internally, but this data is not published externally due to low numbers. (A total of 5 SQA employees took paternity leave during 2023.)

	Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for employees of differing gender identities.
	Foster good relations
	Suggestion action of measuring the potential to improve the development of the policy by speaking directly to the Rainbow network.
Protected Characteristic	General Equality Duty
Marriage/Civil Partnership	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	This policy details the entitlements and process to be followed for any employee who is applying for paternity leave and pay. This policy should therefore have a positive impact on all employees as the policy clearly defines the links to external legislative requirements and internal processes to be followed.
	The Paternity policy can be accessed by all SQA colleagues regardless of their Marriage/Civil Partnership status.
	SQA records paternity leave by Marriage/Civil Partnership status internally, but this data is not published externally due to low numbers. (A total of 5 SQA employees took paternity leave during 2023.)
	Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for employees of differing marital status.

	Foster good relations
	There is no evidence to indicate that this policy currently fosters good relations between employees of different Marital Status.
	No further recommendations are made in respect of this in relation to this policy.
Protected Characteristic	General Equality Duty
Pregnancy / Maternity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Please refer to the separate EqIA for SQA's Maternity policy.
	Conclusion: Probable positive impact
	Advance equality of opportunity
	There is no specific evidence to suggest that the Paternity Policy advances equality of opportunity for employees who are pregnant/on maternity.
	Foster good relations
	There is no evidence to indicate that this policy currently fosters good relations between employees who are Pregnant or on Maternity Leave.
	No further recommendations are made in respect of this at this stage.
Considered by SQA	General Equality Duty
Care experience (where relevant)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

Whilst there is currently no evidence to suggest that care experience colleagues are placed at a disadvantage compared to other colleagues, it is recommended that data is collected and an analysis, by care experience, be performed of the 'lifecycle' of colleagues to identify any adverse trends and consider what support for growth and performance is needed.

Advance equality of opportunity

All SQA employees are entitled to use, access and be subjected to the Paternity Policy and there is no evidence to indicate that this scheme could affect employees differently or less favourably, on the grounds of Care Experience. The absence of evidence should be rectified, if possible, by collection of data relating to care experience.

Foster good relations

There is no evidence to indicate that the Adoption Policy currently fosters good relations between employees who are Care Experienced.

No further recommendations are made in respect of this at this stage.

Rationale

If you are proceeding with a decision that may have a negative impact and are not putting in place actions to mitigate against this, please explain how this is objectively justified.

N/A