



**EQUALITY IMPACT ASSESSMENT
PRELIMINARY SCREENING**

School/ Department	Human Resources
Date	08/04/2013

Name of Policy*
Acceptance of Personal Gifts and of Hospitality by Members of The Board of Governors and Staff

What are the aims, objectives & projected outcomes?	
<p>The Royal Conservatoire of Scotland is responsible for the expenditure of significant sums of money through the purchase of commodities and services and through the awarding and tenders for contracts. In addition, the Royal Conservatoire of Scotland appoints significant numbers of people.</p> <p>The Royal Conservatoire of Scotland is committed to maintaining and promoting high standards of propriety and professionalism.</p> <p>If members of the Board of Governors or staff are offered gifts, hospitality or awards and when they are involved in making staffing appointments, they must do so in keeping with the standards set out by the Conservatoire in this policy.</p> <p>The purpose of this policy is to provide guidelines for members of the Board of Governors and staff in situations where they are offered gifts, hospitality or awards and when they are involved in making staffing appointments.</p>	
This is a new policy	Y
This is a change to an existing policy <i>(Check whether original policy was equality impact assessed. If so, review and update Action Plan).</i>	N
This is an existing policy	N

* The term 'policy' incorporates all Conservatoire procedures, processes and guidance documents

Will the policy have an impact on students, staff or members of the public?	Y
Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy?	Y
Are there any aspects of the policy that could contribute to equality or inequality?	N
<p>If you answer <u>YES</u> to any of these questions, go on to the full EIA. If you answer <u>NO</u> to all of these questions, please provide appropriate evidence and sign off.</p>	

This policy was screened for impact on equalities. The following evidence has been considered. No full equality impact assessment is required.	
<i>[Insert evidence]</i>	
Senior Manager sign-off	N/A
Date	

Please return the completed form to Roz Caplan, Conservatoire Equality and Diversity Officer either by internal mail or by email to: r.caplan@rcs.ac.uk

FULL EQUALITY IMPACT ASSESSMENT TEMPLATE

School/ Department	Human Resources
Date	08/04/2013

Name of Policy

Acceptance of Personal Gifts and of Hospitality by Members of The Board of Governors and Staff

What are the aims, objectives & projected outcomes?

The Royal Conservatoire of Scotland is responsible for the expenditure of significant sums of money through the purchase of commodities and services and through the awarding and tenders for contracts. In addition, the Royal Conservatoire of Scotland appoints significant numbers of people.

The Royal Conservatoire of Scotland is committed to maintaining and promoting high standards of propriety and professionalism.

If members of the Board of Governors or staff are offered gifts, hospitality or awards and when they are involved in making staffing appointments, they must do so in keeping with the standards set out by the Conservatoire in this policy.

The purpose of this policy is to provide guidelines for members of the Board of Governors and staff in situations where they are offered gifts, hospitality or awards and when they are involved in making staffing appointments.

1 SCOPING THE EIA

1.1 Scope of the EIA work

The Acceptance of Gifts and Hospitality by Members of the Board of Governors and Staff Policy went to the Consultative Forum in April 2010

This policy overlaps significantly with the Anti-Bribery Policy that was launched in November 2012 in its aims to avoid any possibility of bribery of Conservatoire team members.

This is the first EIA that has been done on this policy.

2 COLLECTING DATA

2.1 What relevant quantitative and qualitative data do you have?

This may include national research, surveys or reports, or research done by colleagues in similar areas of work.

Please list any evidence in the boxes below (complaints, satisfaction surveys, focus groups, questionnaires, meetings, email, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy/guidance/operational activity.

Race	There is a possibility that the policy may give rise to insensitive treatment of different racial groups where there are cultural norms related to gift-giving, however is no evidence of this to date.
Religion or belief & non-belief	There is no evidence available to suggest that in relation to race there are any different needs, experiences or attitudes in relation to this.
Disability	There is no evidence available to suggest that in relation to race there are any different needs, experiences or attitudes in relation to this
Gender	There is no evidence available to suggest that in relation to gender there are any different needs, experiences or attitudes in relation to this
Gender Identity	There is no evidence available to suggest that in relation to gender identity there are any different needs, experiences or attitudes in relation to this
Sexual Orientation	There is no evidence available to suggest that in relation to sexual orientation there are any different needs, experiences or attitudes in relation to this
Age	There is no evidence available to suggest that in relation to age there are any different needs, experiences or attitudes in relation to this

2.2 What are the overall trends/patterns in this data?

The main consideration for the current EIA is to assess whether there is any possibility of the policy having an impact on the Conservatoire's relations with different racial groups.

2.3 Please list the specific equality issues and data gaps that may need to be addressed through consultation and/or further research?

External sources to be consulted for best practice in this area.

Key contacts within the Conservatoire to be consulted with on their general experiences in this area.

3 INVOLVING AND CONSULTING STAKEHOLDERS

In this section, describe the data you have gathered through stakeholder involvement and engagement.

3.1 Internal consultation and involvement:

(e.g. with other Departments, Staff (including support groups), Students etc

As part of the internal consultation a conversation was had with a key member of staff dealing with student recruitment – as this was seen as a role where there would be much engagement with external contacts in other cultures.

She advised that she did find there to be a stronger gift-giving culture in the East, particularly countries such as China, Korea, Japan, Middle East, India – accept gifts. She found the US to also have a stronger culture of gift giving. It was harder to foster good business relations without accepting gifts. It was easier to decline gifts in Europe as there was more understanding of bribery culture. Generally the types of gifts received were along the lines of business card holders, picture frames etc. - not beyond acceptable limits.

Feedback what you plan to do as a result of this internal consultation and use it as a basis for work on external consultation.

3.2 External consultation and involvement:

(Strand-specific organisations e.g. charities, local community groups, third sector)

Several sources were consulted for guidance on gift giving and ethnic groups, amongst them the following:

In addition, websites of bodies such as the CIPD and Equality and Human Rights Commission were consulted, but these did not offer any concrete guidance on whether accepting or declining a gift would be received differently by different ethnic groups.

Overall these sources gave limited information.

The most information came from www.culturecrossing.net

This website gives information about cultural norms in different countries – several different examples were consulted in the course of completing the EIA – most cultural norms related to the way in which gifts were received – i.e. whether they should be wrapped or opened upon receipt. For the majority of countries consulted, it is not normal to exchange gifts at meetings. Israel would consider this a norm but not if it was too expensive. There were some countries such as Egypt, where it was advised that gifts should not be too expensive as this might be seen as a bribe.

Based on this the terms of the policy should be acceptable to varying cultural groups, as the policy allows for the receipt of token value gifts.

Feedback what you plan to do as a result of the engagement to all participants including internal and external stakeholders.

4 ASSESSING IMPACT

In this section please record your assessment and analysis of the evidence. This is a key element of the EIA process as it explains how you reached your conclusions, decided on priorities, identified actions and any necessary mitigation.

4.1 Assessment of the impact

Having reviewed internal and external sources, it appears that the Policy should have a minimal impact on cultural groups.

Now complete the EIA Action Plan.

5 ACTION PLANNING AND SIGN OFF

5.1 Sign-off

Now submit your EIA and related evidence for clearance.

Date of completion of EIA	April 2013
Compiled by	Julia Murphy, HR Advisor
Senior Manager sign-off	Jackie Russell, Director of HR
Date to Equality + Diversity Officer	April 2013
Date of publication of EIA Report	April 2013
Review date	April 2014

5.3 Publication and Review

Ensure that the EIA including the Action Plan are published alongside your policy/guidance/operational activity.

IMPORTANT - Review, revise and update annually!

Action Plan Further to Acceptance of Gifts and Hospitality Policy EIA

ACTION / ACTIVITY	OWNER AND INTERESTED STAKEHOLDERS	DEPENDENCIES / RISKS / CONSTRAINTS	COMPLETION DATE	PROGRESS UPDATE
Although the impact of this policy appears to be minimal, continued vigilance is recommended.	<ul style="list-style-type: none"> ○ HR Department ○ Principal's Office ○ Finance ○ All other staff who may receive gifts in the course of their work. 		Ongoing.	Ongoing