



EQUALITY IMPACT ASSESSMENT (EqIA)

Summary results of the EqIA

Title of policy/practice/process/service:

Provision of free sanitary products at Thistle House and Client Legal Services regional offices:

- Civil Legal Assistance Office - Aberdeen and Inverness
- Public Defence Solicitors' Office - Ayr, Aberdeen, Dundee, Edinburgh, Falkirk, Glasgow, Inverness, and Kirkwall.

Is the policy new (proposed), a revision to an existing policy or a review of current policy?

New.

Key findings from this assessment (or reason why an EqIA is not required):

Range of products:

There will be a requirement for different types of sanitary product, fragrance and fragrance free, different types, brands, and absorbency levels. Some users, for religious, medical or personal reasons, may only wish to use non-invasive, and/or fragrance-free products. We are initially going to provide a range of different brands and types to make sure that multiple designs and absorbencies are available and that these are stored appropriately.

Who should they be available to?

The products should be available to all staff and visitors working in and accessing Thistle House, and all Client Legal Services regional offices.

Product location:

Products are to be available in all female and accessible toilets in Thistle House and all toilets in all regional office locations. Since not only women menstruate, but also transgender men, non-binary and agender people, we want to ensure sanitary products are accessible to everyone.

Financial impact:

Final costs are difficult to quantify and will depend on the volume of use. Facilities and Finance teams will consider the relevant costs/contract options including any impact on existing contracts (the collection of sanitary bins). There will also be the cost of storage, distribution and replenishing in toilet areas.

The cost to public funds will be dependent on uptake. If most users take products only in an emergency or where they do not have funds to purchase their own products, the cost will be low. If, however, the policy is regarded as a source of unlimited sanitary products for all, the costs may be significantly higher.

Recommendations and Conclusion

It is recommended that a range of sanitary products are available in all female and accessible toilets, as well as visitor toilets that are available at some of our regional offices. The demand will be monitored by volume over a 12-month timeframe to identify the level of uptake and consider changes to the range of products available in line with usage and feedback.

Clear communication on the purpose of this policy is essential to manage good relations across equality groups and to encourage considerate usage. We will inform our staff and tenants about our policy and the provision of sanitary products in bathrooms via our intranet and email. Thistle House visitors receive a visitors pass when entering/working in Thistle House. This pass includes a range of important information and will be updated to include the availability of sanitary products in our female and accessible bathrooms. Visitors in any of our regional office locations will be able to access sanitary products in any of the bathrooms available.

Summary of actions taken because of this assessment:

We considered the best way to provide free sanitary products, which is to provide a range of products in airtight containers which can be closed with a lid. These containers can be easily placed in bathrooms and are easily and discreetly accessible by staff and visitors.

Each container will have a label attached which provides information about it containing free sanitary products for use. The label will also include a phone number and email address in case people need to let staff know that supply is low, or in case they have any feedback about the products that they'd like to share.

We are initially going to provide a range of different brands, types and absorbency levels to make sure that multiple designs and absorbencies are available and that these are stored appropriately.

Ongoing actions beyond implementation include:

The demand will be monitored by volume over a 12-month time frame, to identify the level of uptake and consider changes to the range of products available in line with usage and feedback.

Ongoing Lead person(s) for this assessment (job title and department only):

Facilities Manager, Facilities.

Senior responsible owner (SRO) agreement that the policy has been fully assessed against the needs of the general duty (job title only):

Director of Corporate Services and Accounts.

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V0.6 Senior Facilities Officer	October 2023	Final draft for review and sign off by Chief Executive

Step 1 - Framing the planned change

Discussing step 1 and step 2 with the Policy Officer (Equalities) at an early stage will help identify appropriate evidence. This may include support from the wider Policy and Development team.

1.1 Briefly describe the aims, objectives and purpose of the policy/practice/process/service. You can use the information in your project specification, business case etc.

Access to free sanitary products to all staff, tenants and visitors based in or visiting Thistle House, and all of our regional Client Legal Services offices, to help contribute to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items, and to ensure everyone has the ability to fully participate in their working lives and/or access public service.

1.2 Why is the change required? Legislative, routine review etc.

The issue of period poverty has had significant and sustained media coverage both within the UK and internationally. The issue has been approached from both a gender equality standpoint and a human rights perspective, arguing that menstruation should be normalised and access to sanitary products considered a human right. A Private Member's Bill - **Period Products (Free Provision) (Scotland) Bill** - completed consultation on 8 December 2017 and received 1753 responses, of which 96% were supportive of the proposal. A final proposal was lodged in March 2018. Access to free sanitary products has been introduced in schools, colleges, universities, and The Convention of Scottish Local Authorities and Scottish Parliament announced on 17 and 18 May 2018 that they would make free sanitary products available for staff and visitors. The Scottish Government has also recently introduced free products in all its buildings for both visitors and employees.

The **Programme for Government** published on 5 September 2023 committed to “*increase the number and range of places where sanitary products are available for those who need them. We [Scottish Government] will do this through working with a range of public and private sector organisations and with additional third sector partners to expand the geographical spread of support.*”

Aileen Campbell, Cabinet Secretary for Communities and Local Government, has written to SLAB to encourage the introduction of freely available sanitary products within our organisation, and Scottish Government distributed guiding principles stating that any chosen delivery model should be based on:

- Protecting people’s dignity, avoiding anxiety, embarrassment and stigma;

- Making a range of products available in places that people use;
- A delivery model that is reflective of communities' views and needs;
- An efficient and effective approach which demonstrates value for money;
- Individuals being able to get sufficient products to meet their needs;
- Gender equality - ensuring anyone who menstruates can access products, including transgender men/non-binary individuals, and that language is gender inclusive;
- Awareness raising and education to both promote the 'offer' and attempt to change cultural norms.

1.3 Who is affected by this policy/practice/process/service? *Be clear about who the 'customer' is.*

The Policy will affect people who menstruate and who work in or visit Thistle House or regional Client Legal Services offices. This includes SLAB employees (including contractors, agency workers), employees of the various tenants, the customers of all the organisations based in Thistle House, and Board members. The policy will also affect individuals who work in and visit SLAB's regional Client Legal Services offices.

1.4 Policy/practice/process/service implementation date? *Project end date, date new legislation will take effect.*

19/10/2023

1.5 What other SLAB policies or projects may be linked to or affected by changes to this policy/practice/process/service?

The EqIA for related policies might help you understand potential impacts, and/or your findings might be relevant to share.

There is the potential for this policy to impact on:

- current contracts in place for sanitary bins and the sanitary dispensing machines already in place in some toilets
- SLAB's People Strategy
- SLAB's carbon management duties: Each pack of pads has the equivalent of four carrier bags worth of plastic in it, which takes over 500 years to biodegrade. In a lifetime, each person who menstruates creates 150kg of menstrual waste, contaminated with blood which gets sent to landfill. However, there are biodegradable and plastic free sanitary products available, which are more environmentally friendly.

SLAB isn't aware of any link to policies or priorities being taken forward by the other organisations based in Thistle House although they are likely to have their own carbon management duties and people policies/strategies.

Step 2: Consider the available evidence and data relevant to your policy/practice/process/service

The information you gather in this section will:

- help you to understand the importance of your policy/practice/process/service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.1 What information is available about the experience of each equality group in relation to this policy/practice/process/service?

Stay focused on the topic and scope of your policy/practice/process/service. Does the policy/practice/process/service relate to an area where there are already known inequalities? Refer to the EqIA guidance for sources of evidence.

Remember, this step in the EqIA process is NOT about the impact your policy has on equality groups and what we need to do to mitigate those. That assessment is done under Step 4.

Note: If you proceed to a full EqIA you should continue to add to this section as you develop the policy/practice/process/service, come across new evidence and/or undertake a consultation.

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Age	(1) Period poverty (2) What is period poverty? (3) NHS Menopause	Period poverty affects women and girls who menstruate all over the world. Access to menstrual products, safe, hygienic spaces in which to use them, and the right to manage menstruation without shame or stigma, is essential for anyone who menstruates. No or limited access can bear a potential health risk, but also have a negative impact on girls' education, and well-being. (1) Period poverty means being unable to access sanitary products, often due to financial constraints. In the UK, 1 in 10 girls can't afford to buy menstrual products, while 1 in 7

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<p>have struggled to afford them, according to a representative survey of 1000 girls and young women aged 14-21 by Plan International UK. (2)</p> <p>In March 2017, Freedom4Girls found that students in the UK are missing school because of a lack of access to sanitary products. (2)</p> <p>The menopause is a natural part of ageing that usually occurs between 45 and 55 years of age and is when a woman stops menstruating. In the UK, the average age for a woman to reach the menopause is 51. Symptoms (for example, vaginal dryness) might influence the range of products to be made available. Consideration could be given to products for incontinence, which links to pelvic floor issues experienced by women who have given birth. (3)</p>
Disability	<p>(4) National Eczema</p> <p>(5) Disabled people have periods, too</p>	<p>Almost 20% of the general population is sensitive to at least one allergen and fragrance is one of the most frequently cited substances causing reactions. Fragrance sensitivity is now seen in 1-4% of the general population, and 8-15% of people with contact dermatitis. (4)</p> <p>Disabled women or people who menstruate face barriers such as inaccessible bathrooms, shame and stigma, and may also struggle to afford sanitary products. Certain products might be inaccessible to some people, especially those who have a physical disability. Limited mobility, still muscles, pain conditions or sensory issues may make it very challenging for people to use certain products. People with a disability also have a higher risk of poverty which can make it difficult for them to afford sanitary products. (5)</p>
Race	N/A	<p>No specific evidence with regards to period poverty or access to sanitary products and race in the UK were found. A couple of articles investigated the effect of period poverty on the black community and sanitary use by demographics, however they are based on US population.</p>

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Sex	<p>(6) Cost of living: 12% of British women are affected by period poverty</p> <p>(7) Free period products, when and where we need them</p> <p>(8) Third Force News</p> <p>(9) Free Periods website</p> <p>(10) Scottish Government Social Research on access to sanitary products (Aberdeen pilot)</p>	<p>A new survey by ActionAid UK has found that nearly one in eight women in Great Britain have struggled to buy menstrual products in the last six months for themselves and/or a dependant. Soaring inflation and high energy bills may force people to prioritise other household essentials over buying sanitary products. Period poverty, as well as stigma surrounding periods, has a real lasting and often damaging impact on people’s lives. There were lots of reasons why women felt scared, embarrassed, or anxious during their period in the last year. This included leaking through their clothes, changes to their body like bloating or skin changes, and people seeing them take period products to the toilet. 14% of an estimated six million women have avoided or missed exercise and two million women have avoided or missed work due to being on their period in the last year. (6)</p> <p>The high costs and inaccessibility of period products is a gendered issue. A lack of access to period products provokes shame, discomfort, distress and health risks for women and girls, limiting their enjoyment of school, work and leisure. Period products are an additional cost for women who already have lower incomes compared with men and more limited access to resources. With women spending approximately £5000 on tampons, pads or other sanitary products in their lifetime, ensuring that managing menstruation with dignity is a privilege reserved for those who can readily afford it. (7)</p> <p>Three in 10 women say that have been unable to afford menstrual products, one in four bled through every day or most days of their period, and 68% have had to use a makeshift product. Almost half of women wear products for longer than they should and</p>

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
		<p>over a quarter of schoolgirls and women have missed school or work because they've been unable to afford products. (8)</p> <p>Menstrual products cost more than £18,000 in a women's life (£13 every month). Note that this cost includes other related spending, for example pain relief. Other sources stated costs are nearer £4,800 (Bloody Good Period). (9)</p> <p>Having a choice of type, absorbency and other practical aspects were highlighted as the most important elements. Generally, a specific brand was not viewed as important, and many participants said they were happy to use unbranded products. However, there were a small number of negative comments on supermarket own brand products, while branded products were sometimes discussed as "better" or "good quality".</p> <p>Key considerations for provision identified across the different data sources were around ease of access or convenience, provision that is discreet and does not identify recipients as needing help, and preventing misuse or abuse of any provision. (10)</p>
Gender Reassignment	<p>(11) Gender and period care products</p> <p>(12) What it's like to get your period when you're trans</p>	<p>The genders that experience a monthly period include cisgender women, transgender men, agender people and non-binary people. Not all people who have periods are women, and not all women have periods. (11)</p> <p>Menstruation is not something only 'women' deal with. Periods can also affect trans men, non-binary and genderqueer people. Periods can not only be very painful, but they can also cause gender dysphoria. Trans people may find it extremely difficult, emotionally and physically, to deal with their periods. Certain products such as tampons or a menstrual cup can cause extreme dysphoria. The availability of sanitary products in men's bathrooms is also rare. (12)</p>
Sexual orientation	N/A	No specific evidence was found about this protected characteristic and access to sanitary products.

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Religion or Belief	(13) Period Products (Free Provision) (Scotland) Act 2021: Equality Impact Assessment	No specific evidence about this protected characteristic and access to sanitary products were found. However, we know that some religions are more likely to experience poverty and therefore may benefit from access to free period products. Some religious beliefs concerning menstruation may restrict access and use of certain types of products, such as tampons. Therefore, access to a variety of products may be of benefit. (13)
Pregnancy or maternity	(14) NHS - How soon can I use tampons after giving birth?	There is different literature on the use of sanitary products during and after pregnancy. The NHS recommends to not use internal sanitary products until after the six-week postnatal check to avoid the risk of infection. (14)
Marriage/civil partnership	N/A	This protected characteristic is only relevant with regards to employment law.
Care Experienced (<i>corporate parenting duty</i>)	(15) Who cares? Scotland	No specific evidence about this protected characteristic was found. However, many care experienced young people live in poverty. Coupled with other protected characteristics, namely Sex and Disability, there could be scope for intersectional impact with regards access to sanitary products. (15)

2.2 Using the information above and your knowledge of the policy/practice/process/service, summarise your overall assessment of how important and relevant the policy/practice/process/service is likely to be for equality groups.

Period poverty affects people of all ages from all around the world. Many people are not able to afford sanitary products and consequently they might use unhygienic products, such as newspaper, or use sanitary products for much longer than is safe and risk toxic shock syndrome (TSS). People who can't afford to buy sanitary products might miss out on school days or work in fear of getting their period or because they have their period and don't have access to sanitary products.

Whilst a lack of access to sanitary products is an issue, it's also problematic if people don't have access to the products they need. There is a variety of different sanitary products, different brands, types and shapes, as well as different absorbency levels. Depending on personal, religious or medical reasons, people require different products. For example, people with a physical disability might not be able to safely insert and take out a tampon, some transgender men might suffer from dysphoria which might be worsened by having to use a tampon. Certain religion might restrict people from tampon use, and people with eczema or certain skin conditions need to use fragrance free products. Therefore, it's important to not only consider the provision of free sanitary products, but also provide a range of different products. For these and many other reasons, a variety of sanitary products would be of benefit for everyone.

2.3 Outcome of step 2 and next steps. Complete the table below to inform the next stage of the EqIA process.

Consult with the project group and/or Corporate Policy Officer (Equalities) on completing this section.

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality or our corporate parenting duties		Proceed to Step 5: agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all the equality groups and/or our corporate parenting duties	Y	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all the equality groups and/or our corporate parenting duties		Proceed to Step 3: complete full EqIA

Step 3 - stakeholder involvement and consultation

This step will help you to address any gaps in evidence identified in Step 2. Speaking to people who will be affected by your policy/practice/process/service can help clarify the impact it will have on different equality groups.

Remember that sufficient evidence is required for you to show ‘due regard’ to the likely or actual impact of your policy/practice/process/service on equality groups. An inadequate analysis in an assessment may mean failure to meet the general duty.

The Policy and Development team can help to identify appropriate ways to engage with external groups or to undertake research to fill evidence gaps.

3.1 Do you/did you have any consultation or involvement planned for this policy/practice/process service?

Yes

An email invitation was sent to both SLAB stakeholders and tenants to inform and consult them on our policy proposal to provide free sanitary products.

3.2 List all the stakeholder groups that you will talk to about this policy/practice/process/service.

An email was sent to the following parties advising of possible policy implementation and invitation to hear their views:

- Mental Welfare Commission
- Children’s Hearings Scotland
- SLAB Human Resources managers.

3.3 What did you learn from the consultation/involvement? Remember to record relevant actions in the assessment action log.

Human Resources input includes the following key points:

- No comments from a “wellbeing” approach but queried policy from a facilities perspective (for example, hand sanitation and/or tissues) and that supplies are for all tenants, not just SLAB employees.
 - *There was no comment on this from the Facilities Manager.*
- Suggestion to dispense from a free vending machine to make it hygienic, workable and minimise costs/risks highlighted in this EqIA, which may not be met through having products in baskets.

- *Facilities Manager stated that to provide a range of products and cover remote offices at the same level, sealed containers will be used. This is in line with the approach taken in Scottish Government.*
- Placement of products should be in visitor and accessible toilets, and advertised as such so that anyone could access them if needed.
 - *Facilities Manager agreed.*
- Consideration should be given to this policy under the People Strategy to ensure approach links with the priorities set out for the organisation and as part of the wider suite of workstreams to be delivered.
 - *There was no comment on this from the Facilities Manager.*

Both the Facilities team and Director of Corporate Services and Accounts are aware of this feedback and have considered the implications for the final policy.

Step 4 - Impact on equality groups and steps to address these

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

4.1 Does the policy/practice/process/service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

In the tables below, record the impact the policy/practice/process/service might have on each equality characteristic, as it is planned or as it operates, and describe what changes in policy/practice process/service or actions will be required to mitigate that impact. Copy any actions across to the project action log.

All protected characteristics	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			By providing a range of free sanitary products to everyone who menstruates and requires sanitary products we contribute to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.
potential for developing good relations	X			By providing a free range of sanitary products we support everyone who menstruates to get access to a basic need. Open communication about

				this policy might raise awareness and understanding about period poverty.
potential to advance equality of opportunity	X			<p>Period poverty affects people who menstruate of all ages all over the world. It's important that everyone who menstruates has access to a variety of sanitary products that are safe and hygienic.</p> <p>By providing free access to a variety of sanitary products, we can ensure that people don't miss out on work because they lack access to sanitary products. A variety of products would provide the benefit that people can choose the product based on their personal preference and their physical and mental ability to use them.</p> <p>A range of period products will be placed in airtight containers which are available in each bathroom. Having to speak up and ask for products can be a barrier for people. They might feel uncomfortable to ask for sanitary products. This will ensure discreet and easy access.</p>

Age	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			By providing a range of free sanitary products to everyone who menstruates and requires sanitary products we contribute to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.
potential for developing good relations	X			By providing a free range of sanitary products we support everyone who menstruates getting access to a basic need. Open communication about

				this policy might raise awareness and understanding about period poverty.
potential to advance equality of opportunity	X			<p>Period poverty affects people who menstruate of all ages all over the world. It's important that everyone who menstruates has access to a variety of sanitary products that are safe and hygienic.</p> <p>By providing free access to a variety of sanitary products, we can ensure that people don't miss out on work because they lack access to sanitary products. A variety of products would provide the benefit that people can choose the product based on their personal preference and their physical and mental ability to use them.</p> <p>A range of period products will be placed in airtight containers which are available in each bathroom. Having to speak up and ask for products can be a barrier for people. They might feel uncomfortable to ask for sanitary products. This will ensure discreet and easy access.</p>

Sex	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			Period poverty is considered by many to be a form of sex-based discrimination. By providing a free range of sanitary products to everyone, this policy contributes to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.
potential for developing good relations	X			By providing a free range of sanitary products we support everyone who menstruates to get access to a basic need. Open communication about

				this policy might raise awareness and understanding about period poverty.
potential to advance equality of opportunity	X			Nearly one in eight women in Great Britain have struggled to buy menstrual products at a certain point in time for themselves and/or a dependent. Inflation and high energy bills often force people to prioritise bills and household essentials over buying sanitary products. Consequently, they have been wearing products longer than is safe and/or have missed out on work or leisure activities. By providing free access to a variety of sanitary products we can ensure that people don't miss out on work because they lack access to sanitary products. A variety of products provides the benefit that people can choose the product based on their personal preference and their physical and mental ability to use them. A range of period products will be placed in airtight containers which are available in each bathroom to ensure easy and discreet access.

Disability	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			By providing a free range of sanitary products to everyone, this policy contributes to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.
potential for developing good relations	X			By providing a free range of sanitary products we support everyone who menstruates to get access to a basic need. Open communication about

				this policy might raise awareness and understanding about period poverty.
potential to advance equality of opportunity	X			<p>Disabled women or people who menstruate may struggle to afford and use certain sanitary products. Limited mobility, stiff muscles, pain conditions or sensory issues may make it challenging for people to use certain products.</p> <p>By providing a variety of free sanitary products we can ensure that people with a disability have access to the type of sanitary product that suits their needs. Providing fragrance free products will help to avoid any reaction to products for those with skin conditions or severe allergies. A range of period products will be placed in airtight containers which are available in each bathroom to ensure easy and discreet access.</p>

Gender reassignment	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			Period poverty is considered by many to be a form of gender-based discrimination. By providing a free range of sanitary product to everyone, this policy contributes to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.
potential for developing good relations	X			By providing a free range of sanitary products we support everyone who menstruates to get access to a basic need. Open communication about this policy might raise awareness and understanding about period poverty.

potential to advance equality of opportunity	X			Periods can affect anyone who menstruates, which includes transgender men, non-binary and genderqueer people. These groups might find it emotionally difficult to deal with having a period. Dysphoria can be prevalent and certain sanitary products, such as tampons or menstrual cups can have a negative impact on their mental health. By providing a free variety of sanitary products in all bathrooms we can support this equality group to get access to a range of period products that suit their needs. A range of period products will be placed in airtight containers which are available in each bathroom to ensure easy and discreet access.
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Race	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	No specific evidence was found.
potential for developing good relations			X	No specific evidence was found.
potential to advance equality of opportunity			X	No specific evidence was found.

Religion or Belief	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			By providing a free range of sanitary product to everyone, this policy contributes to increased dignity and equality in the workplace by making

				sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.
potential for developing good relations	X			By providing a free range of sanitary products we support everyone who menstruates to get access to a basic need. Open communication about this policy might raise awareness and understanding about period poverty.
potential to advance equality of opportunity	X			No specific evidence about this protected characteristic and access to sanitary products were found. Some religious beliefs concerning menstruation may restrict access and the use of certain types of products, such as tampons or menstrual cups. By providing a free variety of sanitary products in all bathrooms we can support this equality group to get access to a range of period products that suit their needs. A range of period products will be placed in airtight containers which are available in each bathroom to ensure easy and discreet access.

Sexual Orientation	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	No specific evidence was found.
potential for developing good relations			X	No specific evidence was found.
potential to advance equality of opportunity			X	No specific evidence was found.

Pregnancy & Maternity	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			By providing a free range of sanitary product to everyone, this policy contributes to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.
potential for developing good relations	X			By providing a free range of sanitary products we support everyone who menstruates to get access to a basic need. Open communication about this policy might raise awareness and understanding about period poverty.
potential to advance equality of opportunity	X			No specific evidence about this protected characteristic and access to sanitary products were found. The NHS recommends to not use internal sanitary products until after the six-week postnatal check to avoid the risk of infection. By providing a free variety of sanitary products in all bathrooms we can support this equality group to get access to a range of period products that suit their needs. A range of period products will be placed in airtight containers which are available in each bathroom to ensure easy and discreet access.

Marriage & Civil Partnership	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	

potential for discrimination			X	This protected characteristic is only relevant with regards to employment law.
potential for developing good relations			X	This protected characteristic is only relevant with regards to employment law.
potential to advance equality of opportunity			X	This protected characteristic is only relevant with regards to employment law.

Care experienced young people	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination			X	No specific evidence for this protected characteristic was found.
potential for developing good relations			X	No specific evidence for this protected characteristic was found.
potential to advance equality of opportunity			X	No specific evidence for this protected characteristic was found.

4.2 Describe how the assessment so far might affect other areas of this policy/practice/process/service and/or project timeline?

By providing a free range of sanitary product to everyone, this policy contributes to increased dignity and equality in the workplace by making sure that nobody suffers the indignity and anxiety of not being able to access these essential items and to ensure everyone can fully participate in their working lives and/or access public service.

4.3 Having considered the potential or actual impacts of your policy/practice/process/service on equality groups, you should now record the outcome of this assessment below.

Choose from one of the following (mark with an X or delete as appropriate):

Please select (X)	Implications for the policy/practice/process/service
X	<p>No major change Your assessment demonstrates that the policy/practice/process/service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
	<p>Adjust the policy/practice/process/service You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy/practice/process/service when implemented.</p>
	<p>Continue the policy/practice/process/service with adverse impact The policy/practice/process/service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.</p>
	<p>Stop and remove the policy/practice/process/service The policy/practice/process/service will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step 5 - Discuss and review the assessment with decision makers and governance structures

You must discuss the findings of this assessment with senior decision makers during the lifetime of the project/review and before you finalise the assessment. Relevant groups include, but are not limited to, a Project Board, Executive Team or Board members. EqlA should be on every project board agenda therefore only note dates where key decisions have been made (for example draft EqlA sign off, discussion about consultation response).

5.1 Record details of the groups you report to about this policy/practice/process/service and impact assessment. Include the date you presented progress to each group and an extract from the minutes to reflect the discussion.

- **11 March 2019:** Discussion with Director of Corporate Services and Accounts, Facilities team, and Policy Officer (Equalities), were mitigating actions noted in Step 4 were discussed.

Step 6 - Post-implementation actions and monitoring impact

There may be further actions or changes planned after the policy/practice/process/service is implemented and this assessment is signed off. It is important to continue to monitor the impact of your policy/practice/process/service on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

6.1 Record any ongoing actions below.

This can be copied from the project action log or elsewhere in this assessment and should include timescales and person/team responsible. If there are no outstanding items, please make this clear.

N/A.

6.2 Note here how you intend to monitor the impact of this policy/practice/process/service on equality groups. In the table below you should:

- *list the relevant measures,*
- *identify who or which team is responsible for implementing or monitoring any changes,*
- *identify where the measure will be reported to ensure any issues can be acted on as appropriate.*

Measure	Lead department/ individual	Reporting (where/ frequency)
Monitoring the update of different products and analysing potential feedback to identify the best product range and quantity.	Facilities	Initially on a weekly basis, then monthly checks.

6.3 EqlA review date.

This EqlA should be reviewed as part of the post-implementation review of the policy/practice/process/service. The date should not exceed three years from the policy/practice/process/service implementation date.

17/10/2026

Step 7 - Assessment sign off and approval

Once final consultation has been undertaken with Corporate Policy Officer (Equalities), all equality impact assessments must be signed off by the relevant Director or Senior Responsible Owner (SRO), even where an EqlA is not required. The Chief Executive must approve all equality impact assessments. Note the relevant dates here:

Director/SRO sign off: 11/10/2023

Chief Executive approval: 17/10/2023

All full equality impact assessments must be published on SLAB's website as early as possible after the decision is made to implement the policy, practice, process or service.