request-1330473-dc8d04f1@whatdotheyknow.com

Our Ref: UKSBSFOI25-26-050

18 September 2025

Dear

Thank you for your email dated 20 August 2025, in which you requested information relating to employment, equality, and health and safety compliance.

Your request

Due to the volume of the request, it has not been reproduced as a whole within this response letter. However, a copy has been included for your reference as Appendix A (UKSBSFOI25-26-050 Request).

Your request was handled under the terms of the Freedom of Information Act 2000.

Under the Freedom of Information Act 2000 ('the Act'), you have the right to:

- know whether we hold the information you require
- be provided with that information (subject to any exemptions under the Act which may apply).

Our response

UKSBS holds a some of the information you have requested under the Freedom of Information Act (FOIA).

Your questions have been answered in order. Where information is not held, we have stated this explicitly and offered relevant advice or guidance to assist your enquiry.

Please be aware that not all requested information is being released. Certain exemptions under the FOIA apply, and where these are relevant, we have explained the reasons in detail under each applicable question.

1. Governance and Accountability

A: A copy of the organisation's current Equality, Diversity & Inclusion (EDI) Strategy and any reports presented to the Board or Executive Committee on its implementation

Please find attached:

- **Appendix B** – UKSBS Equality, Diversity and Inclusion Strategy 2025–2028.
- **Appendix C** – Executive and Board Committee papers discussing the implementation of the EDI Strategy.

B: Any document (e.g. Responsible, Accountable, Consulted, Informed (RACI) matrix, scheme of delegation, committee terms of reference) defining which executive, role,

or committee holds ultimate accountability for compliance with the Equality Act 2010 and the Public Sector Equality Duty (PSED).

Please find attached:

Appendix D – The Equality Diversity and Inclusion Terms of Reference

C: The minutes of any Executive Committee, Audit Committee, or Board meetings where the PSED (s.149 Equality Act 2010), Equality Objectives, or Equality Impact Assessments (EIAs) were a substantive agenda item

Please find attached:

- **Appendix E** – Extracts from Executive Committee minutes where the Public Sector Equality Duty (PSED), Equality Objectives, or Equality Impact Assessments (EIAs) were substantive agenda items. These extracts cover the period from September 2021 to January 2023.

Please note: Minutes from 2022 onwards were disclosed in a previous FOI response (UKSBSFOI25-26-035).

D: Copies of all published Equality Objectives and all annual Equality Information reports (or equivalent Public Sector Equality Duty compliance reports) for the period covered by this request. For each document, please also provide the date of publication and the precise URL where it was made publicly available.

In accordance with the provisions of the Freedom of Information Act 2000 ("the Act"), UKSBS has invoked the following exemption in relation to your request

Section 21 – Information reasonably accessible by other means.
The above exemption is absolute and class-based and therefore no Public Interest Test or Harm Test is required.

The information that you have requested is already reasonably accessible to you by other means and is therefore exempt by virtue of Section 21 of the Freedom of Information Act 2000. UKSBS are required to make certain information available to the public as part of a publication scheme.

The information requested is available in the public domain via the following address: Equality, diversity and inclusion and uksbs-annual-report-and-financial-statements-23-24.pdf.

E: Copies of any correspondence with the Government Equalities Office, Cabinet Office, or other regulators regarding compliance with the PSED or Equality Objectives.

No information is held. UKSBS has no record of correspondence with the Government Equalities Office, Cabinet Office, or other regulators regarding Equality Objectives. UKSBS is not bound by the Public Sector Equality Duty (PSED).

2. Executive Training and Competence

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Company Number 6330639. Registered Office Polaris House, North Star Avenue, Swindon, Wiltshire SN2 1FF

A: Dates, format, duration, and attendance of all training provided to the Executive Committee on the Equality Act 2010 and the PSED, including whether it covered individual protected characteristics
B: Whether each training was a generic all-staff module or a dedicated executive-level programme

Please find attached:
Appendix F – Details of Executive Committee training on the Equality Act 2010, including coverage of protected characteristics.

Please note that some individuals currently serving on the Executive Committee were not in post at the time the training was delivered. As a result, their records do not contain relevant training data and have therefore returned blank.

C: Copies of training materials used and any evaluation/feedback reports

UKSBS holds some of the information relevant to your request.

However, we must advise that feedback and training materials dated between 2019 and 2021 are no longer held. These records have exceeded their designated retention period in accordance with our internal records management policies and have therefore been lawfully disposed of.

We do not hold materials or evaluation/feedback reports for 2022 for the Executive Committee.

As such, UKSBS is unable to provide this specific information under the Freedom of Information Act 2000.

Please find attached:
- **Appendix G** – Executive EDI Training Feedback 2023 and 2024
- **Appendix H** – EDI Training Material for 2023 and 2024

3. Impact Assessment and Performance Measurement

A: All EIAs carried out since April 2019 for new/revised policies, services, budgets, or organisational changes

No data held by UKSBS in the scope of your request. UKSBS is not listed in Schedule 19 of the Public Sector Equality Duty, and we do not exercise any public functions, therefore UKSBS is not obligated to completed Equality Impact Assessments.

B: Internal dashboards, Key Performance Indicators (KPIs), or metrics presented to the Executive or Board for PSED compliance.

No data is held. UKSBS is not bound by the Public Sector Equality Duty.

C: Internal audit reports, compliance reviews, or assurance statements assessing Equality Act/PSED compliance.

No information is held in relation to Equality Act compliance. UKSBS is not bound by the Public Sector Equality Duty.

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D: External audit/benchmarking results (e.g. Stonewall, Disability Confident, Race at Work Charter).

Please find attached:

- **Appendix I** – Disability Confident Employer certificates.
- **Appendix J** – Self Assessment

E: Correspondence with the Equality and Human Rights Commission (EHRC), Cabinet Office, or other regulators regarding equality or PSED compliance.

No information is held. UKSBS has no record of correspondence with the Equality and Human Rights Commission (EHRC), Cabinet Office, or other regulators regarding equality compliance. UKSBS is not bound by the PSED.

F: Copies of any Data Protection Impact Assessments (DPIAs) or Information Commissioner's Office (ICO) correspondence relating to equality or diversity data.

The Data Protection Impact Assessment is jointly owned by UKSBS and UKRI. Both organisations have considered your request under the Freedom of Information Act 2000. We are considering a qualified exemption under Section 31(1) of the Act, which relates to law enforcement. Specifically, this exemption applies where disclosure would, or would be likely to, prejudice:

- The prevention or detection of crime;

Section 31 is a qualified exemption, meaning we are required to apply the public interest test to determine whether the public interest in maintaining the exemption outweighs the public interest in disclosure.

Under Section 10(3) of the FOIA, where a qualified exemption is engaged and the public interest test is required, we are permitted to extend the statutory time limit for responding to the request. We are therefore extending the deadline to allow for full and proper consideration of the public interest factors involved in this case.

4. Workforce Data and Processes

A: The organisation's policy on reasonable adjustments, and monitoring data on requests and outcomes.

UKSBS do not have a policy on reasonable adjustments.

We hold information relating to an element of your request. However,
finding and extracting the information would exceed the cost limit set out by section 12 of the Freedom of Information Act 2000 (FOIA).

The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 states that the 'appropriate limit' for UKSBS is
£450. We have determined that £450 would equate to 18 hours work of staff time to
i. Determining whether information is held
ii. Locating it
iii. Retrieving it
iv. Extracting the information to be disclosed from other information.

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Records of reasonable adjustments are not held in a central register; these are often agreed between the manager and the individual. With 764 employees of which 225 are managers, to locate the information, you have requested would require a manual search of hundreds of records.

Assuming each search would take approximately 5 minutes
minutes to complete – and it is likely that some searches
would take much longer than that – this would equate to over 63 hours' worth of searching. This exceeds the 18 hours which would accrue a charge of £450 or more, triggering the provisions of section 12 of the FOIA.

In accordance with the Act, this represents a Refusal Notice for this element of your request.

B: Policies on bullying, harassment, dignity at work, and monitoring data on related complaints

Please find attached:

- **Appendix K** – Bullying and Harassment Guidance.
- **Appendix L** – Extract from the People Policy Handbook.

5. Pay Gap Reporting and Data Management

A: Staff communications on diversity data collection in Oracle Fusion or earlier systems ("Take Five" newsletters etc.), including any messages to employees on the importance of maintaining the accuracy of their personal data.

Please find attached:

- **Appendix M** – Staff Communications Extract.

B: Documentation on diversity data system migrations, including:

* **Migration plans and retention policies**
* **Reports of data loss during transitions**
* **Recovery/restoration procedures**
* **Staff communications about data loss/system changes.**

UKSBS holds some of the information you have requested.

The Migration Plans and Data Migration Strategy are jointly owned by UKSBS and UKRI. We are considering a qualified exemption under Section 31(1) of the Act, which relates to law enforcement. Specifically, this exemption applies where disclosure would, or would be likely to, prejudice:

- The prevention or detection of crime

Section 31 is a qualified exemption, meaning we are required to apply the public interest test to determine whether the public interest in maintaining the exemption outweighs the public interest in disclosure.

Under Section 10(3) of the FOIA, where a qualified exemption is engaged and the public interest test is required, we are permitted to extend the statutory time limit for responding to the request. We are therefore extending the deadline to allow for full and proper consideration of the public interest factors involved in this case.

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As you have clarified that the request for staff communications specifically concerns official wide circulation communications for specific systems, we have reviewed this request and can confirm that there have been no staff communications issued concerning diversity data loss or system change in the subject systems. Accordingly, there is no recorded information held that would fall within the scope of your request.

6. Governance and Risk Management

A: Your published "Health and Safety at Work" policy designates ultimate responsibility to the "Executive Director (ED)" and oversight responsibility to the "Property Asset Management Director (PAMD)". As these titles do not appear to correspond with your current executive structure, please provide the current, correct job titles of the post-holders who hold these specific responsibilities.

The Chief Executive Officer (CEO) holds ultimate responsibility for Safety and Health within UKSBS.
The Company Secretary is responsible for policy oversight, including Health and Safety policies.

B: Please provide all versions of the corporate and/or departmental risk register entries for "Workplace Stress" and/or "Wellbeing" from 1st April 2019 to the date of this request. For each version, please include the full risk description, the documented mitigation actions, and any recorded changes in risk scoring or status. Please ensure the information provided clearly shows the evolution of this risk over time, with a particular focus on the period since 1st January 2022

UKSBS holds a portion of the information you have requested. UKSBS does not retain risk registers dating prior to April 2021 as these records have exceeded their designated retention period in accordance with our internal Records Management policy and retention schedule and have therefore been lawfully disposed of.

Please note, UKSBS has applied Section 43 (2) prejudice to commercial interests of any person or public authority exemption to a number of risk register entries.

Section 43 (2) is a qualified exemption, meaning we are required to apply the public interest test to determine whether the public interest in maintaining the exemption outweighs the public interest in disclosure.

As referenced in 3.F. Under Section 10(3) of the FOIA, where a qualified exemption is engaged and the public interest test is required, we are permitted to extend the statutory time limit for responding to the request. We are therefore extending the deadline to allow for full and proper consideration of the public interest factors involved in this case.

C: Organisational-level stress risk assessments since April 2019

Please find attached:

- **Appendix N** – Organisational Stress Risk Assessments.

D: Minutes of Health & Safety Committee meetings where stress/wellbeing was discussed

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The information is not held by UKSBS. Health and Safety meetings are to discuss building related matters.

E: Results of staff wellbeing/stress surveys provided to management

UKSBS does not conduct specific wellbeing or stress surveys. Therefore, no data is held in relation to this request.

F: Training records on workplace stress or mental health obligations

UKSBS does not hold specific training records relating to the topics of “Stress in the Workplace” or “Mental Health Obligations.” We do not currently offer dedicated training courses on these subjects, and there is no statutory requirement mandating that all employees must undertake formal training in these areas.

However, elements of these topics are addressed within our mandatory online training modules, including **Preventing Harassment in the Workplace** and **Equality, Diversity and Inclusion (EDI)**, which are delivered via the KnowBe4 platform.

In addition to these modules, UKSBS provides a range of resources and support mechanisms that promote awareness and understanding of mental health and workplace wellbeing. These include:

- The recently launched Manager Bitesize Training Programme
- Access to Mental Health First Aiders
- Ongoing support from the People Team, including a dedicated HR Business Partner assigned to each directorate

G: Health and Safety Executive (HSE) inspection reports, enforcement/improvement notices, or correspondence since April 2019

Please find attached:

- **Appendix O** – 2022 PH Inspection notice UKSBS

H, - Records of workplace fatalities, major injuries, or dangerous occurrences reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) (anonymised).

UKSBS has not recorded any workplace fatalities, major injuries, or dangerous occurrences that fall within the scope of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) since before April 2019.

Accordingly, this information has not been retrieved.

I: Copies of internal audit or assurance reports on Health & Safety compliance since April 2019

Please find attached:

- **Appendix P** – Annual Health and Safety Reports

7. Annual Reporting

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A: Any sustainability/Environmental, Social, and Governance (ESG) reports including equality or H&S metrics.

All information we hold regarding sustainability/Environmental, Social and Governance reports including any equality or H&S metrics are included within reports which can be located on our website

The following exemption applies:

Section 21 – Information reasonably accessible by other means.
The above exemption is absolute and class-based and therefore no Public Interest Test or Harm Test is required.

The information that you have requested is already reasonably accessible to you by other means and is therefore exempt by virtue of Section 21 of the Freedom of Information Act 2000. UKSBS are required to make certain information available to the public as part of a publication scheme.

The information requested is available in the public domain via the following address:
https://www.uksbs.co.uk/publication-scheme/

B: Reports submitted to parent government departments on equality or health & safety compliance

Please find attached:

Appendix P - Annual Health and Safety Reports submitted to parent government departments.
Appendix Q – UKSBS Response Partnership Bodies 2024 H&S assessment

8. Supplier Compliance

A: Policy documents or standard contract clauses requiring supplier compliance with the Equality Act 2010

The UKSBS Corporate Procurement Policy is to use Government Frameworks for our supply chain contracts where possible. Therefore, the majority of our Contracts are under Framework terms and Conditions via CCS.

e.g. GCloud Framework Agreement states the following:

26. Equality and diversity

26.1 The Supplier will comply with any discrimination Laws and other requirements and instructions which CCS and the Buyer reasonably require.

26.2 The Supplier will make sure that all Supplier Staff engaged in the performance of this Framework Agreement and any Call-Off Contract observe this equality and diversity clause 26.

26.3 The Supplier will notify CCS immediately of any legal proceedings issued against it by any Supplier Staff on the grounds of discrimination.

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UKSBS also uses the Government's Standard Contract terms and conditions, for example the Government Short Form Contract has, under section 13 the following terms in relation to equality:

13.1.3 [the supplier] must support the Buyer in fulfilling its Public Sector Equality duty under section 149 of the Equality Act 2010.

B: Reports or monitoring data on supplier equality compliance

Monitoring compliance against the Equality Act 2010 would be on a case-by-case basis if deemed necessary, whilst being relevant and proportionate to be able to do so, so as not to create barriers to Small and Medium Enterprise's Voluntary, Community and Social Enterprise's and would be conducted by the UKSBS team that is managing the contract.

This is not something that is known to be centrally reported on or centrally monitored by UKSBS. Reports on supplier compliance would be by exception only, in the case of non-compliance and to the knowledge of the procurement and commercial team's knowledge UKSBS has not had a case to report to the Cabinet Offices Procurement Review Unit to date for Procurement Act 2023 (PA2023) based procurements nor any historic procurements under the previous Public Procurement Regulations 2015 (as amended).

Being that the onus of compliance is upon any supplier to discharge its duties under the Act during its performance under any contract, this is now something that suppliers must declare in their registration on the Governments centrally run digital platform Central Digital Platform (CDP) under the PA2023, so as potential bidders status and suitability can be clearly viewed and demonstrated in regard to transparency during open competition.

Where equality requirements are being incorporated into an openly advertised competition re: the procurement process, this as applicable is set out by UKSBS in the tender documents and as applicable by value in the contract documents published in our procurement notices posted on Contracts Finder and / or the CDP dependent upon the applicable procurement regime. The responsibility for ongoing monitoring of suppliers on existing vehicles to market e.g. a Framework or Dynamic Purchasing System would be the obligation of the owner of that vehicle e.g. the Cabinet Offices Crown Commercial Services team, in accordance with the Framework terms and conditions used to conclude the vehicle.

9. Training Delivery and Formats

A: A list of all training/awareness activities since April 2019 on:
*** Equality, Diversity & Inclusion (including protected characteristics)**
*** Health & Safety (stress, wellbeing, mental health)**
Bullying, harassment, or dignity at work
B: Date(s) delivered
*** Delivery format (e-learning, classroom, virtual, "Lunch and Learn", etc.)**
*** Intended audience (executive, managers, all staff)**
*** Whether attendance was mandatory or voluntary**
*** Number of participants completed/attended**
*** Evaluation, feedback, or impact assessment reports"**

UKSBS holds a portion of the information relevant to your request.

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However, we must advise that feedback dated between 2019 and 2021 are no longer held. These records have exceeded their designated retention period in accordance with our internal records management policies and have therefore been lawfully disposed of.

Please find attached:

- **Appendix R** – Staff Training and Awareness Activities.
- **Appendix S** – UKSBS Staff EDI Training Feedback 2023.
- **Appendix T** – UKSBS Staff EDI Training Feedback 2024.
- **Appendix U** – UKSBS EDI Enrolments 2019-2022.
- **Appendix V** – Mental Health First Aider Training Feedback 2022.
- **Appendix W** – Preventing Harassment in the Workplace feedback

10. "Lunch and Learn" Programme Governance

A: Policies, protocols, or guidance on "Lunch and Learn" sessions, including treatment as working time or voluntary.

UKSBS does not hold any formal policies, protocols, or guidance relating to "Lunch and Learn" sessions.

"Lunch and Learn" are un-mandatory sessions and are not part of formal training.

B: Complaints, concerns, or correspondence regarding timing, content, or mandatory/voluntary nature.

UKSBS has received two concerns regarding "Lunch and Learn" sessions:

- Both concerns related to the timing of the sessions.
- One concern raised issues about the sessions being considered workplace training and development.

C: Records of any policy changes following complaints/concerns

UKSBS does not hold any policies, protocols, or guidance on "Lunch and Learn" sessions. Therefore, no policy changes have been recorded in response to these concerns.

D: Copies of "Take Five" newsletters or equivalent staff communications referencing wellbeing, diversity, or training

We hold information relating to an element of your request. However,
finding and extracting the information would exceed the cost limit set out by section 12 of the Freedom of Information Act 2000 (FOIA).

As we have communicated earlier in our response the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 states that the 'appropriate limit' for UKSBS is £450. We have determined that £450 would equate to 18 hours work of staff time to
i. Determining whether information is held
ii. Locating it
iii. Retrieving it
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There are 166 records in which the Communications Team would need to review.

Assuming each search would take approximately 30 minutes
minutes to locate with an additional 20 minutes per edition to review and extract – this would exceed the 18 hours which would accrue a charge of £450 or more, triggering the provisions of section 12 of the FOIA.

In accordance with the Act, this represents a Refusal Notice for this element of your request.

11. Tribunal Claims and Outcomes

A: A list of all Employment Tribunal claims since April 2019, including:
* **Case reference (or anonymised identifier)**
* **Date lodged**
* **Protected characteristic(s) cited**
* **Outcome (settled, withdrawn, judgment, ongoing)"**

We can confirm that the information you have requested is held by UKSBS. However, in accordance with the provisions of the Freedom of Information Act 2000 ("the Act"), UKSBS has invoked the following exemption in relation to your request:

Section 32(1)(a) of the Freedom of Information Act 2000, which exempts information held only by virtue of being contained in documents filed with or created for the purposes of legal proceedings, including employment tribunals.

This exemption applies because the information in question is held solely for the purposes of an ongoing employment tribunal claim and therefore falls within the scope of Section 32. As such, we are not obliged to disclose it under the Act.

Section 32 is an absolute exemption, which means there is no requirement to consider the public interest test in this case**.**

B: Reports or summaries to the Board/Executive/Audit Committee on tribunal claims, outcomes, or lessons learned
C: Total sums paid in settlements, awards, and legal costs (anonymised by case type).
D: Policy/procedure changes implemented as a direct result of tribunal outcomes

Following a review of our records, UKSBS can confirm that it does not hold information within the scope of the above requests.

No formal reports or summaries have been submitted to the Board, Executive Committee, or Audit Committee concerning tribunal claims, their outcomes, or associated lessons learned.

Similarly, UKSBS does not hold records detailing total sums paid in settlements, awards, or legal costs by case type. Furthermore, no documented policy or procedural changes have been implemented as a direct result of tribunal outcomes.

Accordingly, UKSBS is unable to provide the requested information under the Freedom of Information Act 2000.

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UKSBS does not hold any information on Reports or summaries to the Board/Executive/Audit Committee on tribunal claims, outcomes, or lessons learned.

Exemption under Section 40.

Section 40 – personal information. In a few of the appendices, we have redacted the names of some UKSBS staff and third parties. This information is exempt under section 40(2) of the FOIA. Disclosure of this data would break the first principle of data protection - that personal data is processed lawfully, fairly and in a transparent manner. There is no strong legitimate interest that would override the prejudice that disclosure would cause to the rights and freedoms of the individuals concerned. So, we are withholding the information under section 40(2) of the FOIA.

I hope this information is of assistance.

If you are dissatisfied with the above response, you have a right to request a review of your Freedom of Information request. Details of the complaints and review procedure are appended to this letter.

Yours sincerely

UKSBS Freedom of Information Team

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