

26th May 2025

Your Freedom of Information (Scotland) Act 2002 (“the Act”) request

Thank you for your email which was received by VisitScotland on 15th May 2025 at 1.24pm requesting the below information:

1. Can Visit Scotland provide information on the content of equality and diversity learning materials, including when they were last evaluated and how Visit Scotland evaluates the impact on how employees change their approach to their work?
2. Can you please advise what new evidence Visit Scotland has found that
 - a. makes UBT an effective tool for delivering equality
 - b. what evaluation has been made of the training
 - c. what data gathering has been put in place to link training to measurable outcomes?
3. Why has the protected characteristic of ‘sex’ been omitted from the report?
 - a. Could you please set out the reasons for not publishing data on the protected characteristic of ‘gender reassignment’ ?
4. Provide a copy of Trans Policy

VisitScotland’s Response

I have used the same numbering used in your request to provide the following information:-

- 1. Can Visit Scotland provide information on the content of equality and diversity learning materials, including when they were last evaluated and how Visit Scotland evaluates the impact on how employees change their approach to their work?**

We launched our Equality, Diversity and Inclusion (EDI) Mandatory Learning in 2024. This training is delivered through our digital learning platform, Virtual College.

The EDI course covers a range of topics, including:

- Understanding the principles of equality, diversity, and inclusion
- Recognising and addressing unconscious bias
- Legal responsibilities under the Equality Act 2010

- Inclusive language and behaviour in the workplace
- Practical scenarios to apply inclusive practices in day-to-day work

The course content was last evaluated in 2024, at the time of its launch. We are committed to annual reviews of the material to ensure it remains current, relevant, and aligned with best practices and legal requirements which is completed in collaboration with our colleagues at Virtual College.

To assess the impact of the training on our employee's behaviour and approach to work, we will utilise our next employee engagement survey which will incorporate questions relating to our EDI training and the impact it has on our business. We also ask all employees to provide feedback at the end of the EDI training which we will review to assess the effectiveness of the training and to enable any future enhancements to be made.

VisitScotland's Learning & Organisational Development team also ask for employee feedback throughout the year on learning materials delivered through Virtual College and share the key themes with the dedicated account manager to enhance the user experience as well as feedback on the content.

We continuously seek to improve our approach by incorporating feedback and aligning with national standards and sector-wide developments in EDI.

- 2. Can you please advise what new evidence Visit Scotland has found that**
- a. makes UBT an effective tool for delivering equality**
 - b. what evaluation has been made of the training**
 - c. what data gathering has been put in place to link training to measurable outcomes?**

We have implemented Unconscious Bias Training (UBT) this year as part of our broader Equality, Diversity, and Inclusion (EDI) strategy. This is also Mandatory Learning for all staff. This training is integrated into our recruitment and workplace practices to foster a more inclusive culture.

As detailed in our Equality Mainstreaming Report 2025–2029, unconscious bias is still considered one of the biggest challenges that are faced in recruitment processes. Research suggests that UBT is most effective when it is delivered through interactive workshops or longer-term programmes. Our training is an interactive workshop which encourages our employees to really consider their thought process and to be mindful of unconscious bias. We intend for this training to be a longer-term approach which we will continue to develop and enhance year on year.

We will evaluate the training through:

- Post-training feedback surveys to assess learner engagement and perceived relevance.
- Annual reviews of course content to ensure alignment with current best practices and legal standards.
- Manager and HR feedback to observe changes in team dynamics and inclusive behaviours.

To link training to measurable outcomes, we will review:

- HR analytics to monitor trends in recruitment diversity and promotion rates
- Responses to EDI questions in our employee engagement surveys, as referenced above, to track perceptions of fairness and belonging.

These data points help us evaluate whether the training is contributing to a more inclusive and equitable workplace.

3. Why has the protected characteristic of 'sex' been omitted from the report?

The protected characteristic of sex has not been omitted from our considerations. It is referenced in our Equality Mainstreaming Report, and we have continued to report on gender which is consistent with the approach taken in our previous mainstreaming reports. At the time of the report's development, the UK Supreme Court ruling clarifying the distinction between sex and gender in the context of the Equality Act had not yet been issued. As such, our reporting framework reflected the terminology and guidance available at that time.

We acknowledge the importance of aligning with the most current legal interpretations and best practices. In light of the Supreme Court ruling, we are reviewing our approach to ensure future reports clearly distinguish between sex and gender where appropriate, and that all protected characteristics are accurately and transparently represented.

a. Could you please set out the reasons for not publishing data on the protected characteristic of 'gender reassignment' ?

Our employee Equality, Diversity and Inclusion (EDI) questionnaire includes an option for individuals to self-identify under the protected characteristic of gender reassignment. In the most recent reporting period, no employees selected this option.

As a result, the data presented in our Equality Mainstreaming Appendix reflects only the characteristics for which responses were received. To maintain clarity in our reporting, we have omitted categories with zero responses. This approach is consistent with our previous reporting methodology and ensures that the data presented is both relevant and representative of the current workforce.

We remain committed to providing an inclusive environment for all employees and will continue to monitor and report on all protected characteristics, including gender reassignment, as part of our ongoing EDI efforts.

4. Provide a copy of Trans Policy

Our Trans Policy was published on our internal intranet prior to the recent UK Supreme Court ruling. This policy was developed in line with the guidance and legal interpretations available at the time. Following the ruling, and in recognition of the evolving legal landscape, we have temporarily removed the policy from our intranet and clearly communicated to staff that it is under review.

We are currently awaiting updated guidance from the Equality and Human Rights Commission (EHRC) to ensure that any revisions to the policy are fully aligned with the latest legal standards and best practice. Our aim is to provide a policy that is both legally compliant and supportive of all employees, including trans and non-binary individuals.

We remain committed to fostering an inclusive workplace and will update and reissue the policy once we have received and incorporated the appropriate guidance.

Your right to seek a review

If you wish to request a review of your application under either the Act or the Environmental Information (Scotland) Regulations 2004, your request should be submitted to us in writing, or another permanent format (for example e-mail or voice recording) to:

Ms Vicki Miller
Chief Executive
VisitScotland
Waverley Court
4 East Market Street
Edinburgh

EH8 8BG

Telephone: 0131 473 3603

E-mail: vicki.miller@visitscotland.com

The request for a review should be received by us within 40 days of the date of this letter. Any request for a review should also set out, in as much detail as possible, the reasons why you are not satisfied with our response or the manner in which we have dealt with your application

If you are not satisfied with the result of the review, then you have the right to appeal to the Scottish Information Commissioner.

You can contact the Scottish Information Commissioner at:

Scottish Information Commissioner

Kinburn Castle

Doubledykes Road

St Andrews

Fife

KY16 9DS

Telephone: 01334 464610

Fax: 01334 464611

Email: enquiries@itspublicknowledge.info

You also have the right to appeal to the Court of Session in Scotland on a point of law concerning our response.