



Integrated  
Impact  
Assessment:  
Investment Strategy  
FY24/25

The  
Scottish  
National  
Investment  
Bank



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## Introduction

### **Purpose of the Integrated Impact Assessment (IIA):**

The Bank has statutory duties under the Public Sector Equality Duty, the Fairer Scotland Duty, and the Islands (Scotland) Act 2018 to assess and review the impact of all strategic decisions, policies and practices to ensure that they both advance equality and do not unlawfully discriminate against specific groups.

The Bank uses an Integrated Impact Assessment (IIA) to capture equality, socio-economic disadvantage, and island communities' information and evidence. This is a tool to help support and inform our decisions about the equality implications of a Proposal, for example whether there may be an unfair or unequal effect on different groups of people and if there's ways to mitigate a negative impact and proactively advance equality.

The impact could be as a result of race, disability, age, gender reassignment, religion or belief, sex, and/or sexual orientation. Or, because of socio-economic disadvantage, or demographics, for example.

The aim of the IIA, therefore, is to critically assess:

- ◆ the impact of a Proposal on a particular group, part of a community or our People;
- ◆ whether we're meeting our legal requirements in terms of Public Sector Equality Duty, our Equality Outcomes, and Island communities;
- ◆ whether Socio-economic disadvantage is reduced; and
- ◆ whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.



## Step 1: Initial-screening assessment

### Purpose:

Step 1 is an initial-screening assessment, which is used to determine if a Proposal requires a full impact assessment.

### Part 1: Introductory information

<b>Title of Proposal:</b>	Investment Strategy – Financial Year 2024/25
<b>Report number or Proposal number, if applicable:</b>	Version 2 (September 2024)
<b>Will the Proposal be presented to the Executive Committee, Board and / or a Committee, and if so, when:</b>	It will be presented to the following: <ul style="list-style-type: none"><li>◆ Executive Committee (August 2024)</li><li>◆ Valuations Committee (September 2024)</li><li>◆ The Board (September 2024)</li></ul>
<b>Is this a new or existing Proposal?</b>	Revision of existing Proposal.
<b>Description of Proposal</b>	<p>The Investment Strategy forms part of the Bank's core strategic framework. It outlines the approach we take as an impact investor to invest in line with our missions and commercial objectives to achieve the desired financial and non-financial (impact) outcomes.</p> <p>The Bank's first Investment Strategy was published in 2021; the Strategy drew on both the full and revised Equality Impact Assessment that supported the Scottish National Investment Bank Bill, published in 2019.</p> <p>The Strategy was revised in 2024 to reflect changes to the Bank's investment priorities and the refinement of its investment processes and wider impact and equalities objectives.</p> <p>This IIA has been completed in parallel to the development of the 2024/25 Investment Strategy, changes to the associated investment process and drafting of the Bank's 2024/25 EDI Action Plan to ensure that equalities considerations have been actively considered to support the Bank's wider access to finance objectives.</p>



**Part 2: Initial impact assessment**

A Step 2 full impact assessment will be required where any negative impacts are identified (or potentially identifiable) and/or you have answered YES or UNSURE to any of the questions in this Part 2.

Do you consider this Proposal to have any impact on:					
a. Stakeholders?	b. Our People?	c. Business partners?			
The Investment Strategy provides clarity to stakeholders on our investment principles and processes.	The Investment Strategy provides a clear framework to support our people in their investment activity.	The Investment Strategy provides clarity to our Business Partners on our investment principles and processes.			
<b>What is your assessment of the impact of the Proposal on groups with Protected Characteristics:</b>	<b>H</b> Negative impact	<b>H</b>	<b>N</b>	<b>P</b>	<b>U</b>
	<b>N</b> No impact				
	<b>P</b> Positive impact				
	<b>U</b> Unsure (Limited or no evidence)				
	Age		X		
	Disability		X		
	Gender Reassignment		X		
	Marriage and Civil partnership		X		
	Pregnancy and Maternity		X		
	Race		X		
Religion or Belief		X			
Sex			X		
Sexual Orientation		X			



Part 2: Initial impact assessment continued

<b>Socio-economic inequalities:</b>	<p>The Bank’s Investment Strategy and associated investment processes are intended to deliver a positive impact in relation to socio-economic disadvantage:</p> <ol style="list-style-type: none"><li>1. Through the delivery of its Place mission, the Bank seeks to invest in opportunities that enable improved equality of opportunity.</li><li>2. Through the Bank’s commitment to considering investment opportunities in communities and/or charities to support their specific needs.</li><li>3. Through the Bank’s incorporation of Fair Work and EDI considerations in its ESG risk management processes, mission covenants and Ethical Investment Policy.</li><li>4. Through reference to the Bank’s Equality Strategy that focuses on improving access to finance and working with partners in the ecosystem to address systemic inequalities.</li><li>5. The Bank’s impact assessments, which form part of the investment processes, seek to identify both positive and potential negative non-financial impacts to ensure investments do not knowingly contribute to adverse socio-economic outcomes.</li></ol> <p>The Investment Strategy document and associated investment processes are designed to address recognised areas of inequality, including intersectional disadvantages.</p>
<b>Island communities:</b>	<p>Place-based regeneration, reduced inequality and improved outcomes for people and communities are at the heart of the Bank’s Place mission, which guides the Bank’s investment strategy.</p> <p>The Bank specifically seeks to invest in communities across all of Scotland and the Strategy permits the Bank to flex its investment thresholds (e.g. make smaller investments) where investment demonstrates impact to smaller or remote communities within Scotland, recognising that island and rural communities may have different investment opportunities and needs than those found in more accessible and populated areas.</p>
<b>Is there any cumulative impact as a result of this Proposal and other Bank policies?</b>	<p>The Investment Strategy and associated processes sit alongside the Bank’s wider efforts to engage positively in the ecosystem to deliver a positive impact in relation to equalities and different demographics and communities.</p> <p>This includes, but is not limited to, impact as an employer and impact through policies, insight, partnerships and engagement. Where possible, the Bank seeks to align these activities for maximum positive impact.</p> <p>One specific area where further work is being undertaken by the Bank is in relation to market creation and development to support our Place mission. This is a specific stream of work being progressed in 2024/25, which we hope will lead to further development of our investment activity to positively benefit specific communities in Scotland – with particular focus on rural and island communities and areas of high socio-economic deprivation.</p>



Part 2: Initial impact assessment continued

<p><b>What did you take into consideration when making the choices above?</b></p>	<p>The Investment Strategy forms part of the Bank’s core strategic framework, so the initial overarching assessment covers a range of areas already considered in other Bank policies and practices, such as the Bank’s Equality Strategy, Ethical Investment Policy, ESG and impact toolkits, and guidance given to investment teams to support investment decision-making.</p> <p>An Equalities Impact Assessment was undertaken for the Scottish National Investment Bank Bill, and published in September 2019 (<a href="#">Scottish National Investment Bank Bill: revised EQIA - gov.scot (www.gov.scot)</a>). A <a href="#">Fairer Scotland Duty assessment</a> was also completed in 2019 by the Scottish Government. These assessments were comprehensive, covering all areas of the Bank’s operation and its establishment as a mission-led impact investor and were used to guide the development of the Bank’s first Investment Strategy.</p> <p>A literature review was undertaken in 2023 by a third party consultancy firm to re-review the evidence available on access and barriers to investment finance in Scotland, to support the development of the Bank’s EDI Strategy and the revision of the Bank’s Investment Strategy. The evidence collated did not materially differ from that presented in the Scottish Government’s 2019 EQIA. This review however, highlighted several key areas where the Bank could seek to have a positive impact through its investment activity and processes– notably gender, socio-economic inequality, race and disability. The review found that there was very limited evidence available of how other protected groups were consistently either positively or negatively impacted by investment activity. This review and its findings have influenced the revised 2024 Investment Strategy.</p> <p>Added to this, the Bank also reports its impact and adherence with the Bank missions annually through its reporting processes, with a Mission Report produced for its Shareholder and an Impact Report available to a wider audience.</p> <p>In 2023, the Bank engaged BlueMark to independently verify the alignment of our practices with the Operating Principles for Impact Management. BlueMark’s assessment findings cover both areas of strength and opportunities for improvement. Within the opportunities for improvement, they identified two stages of our process – in origination and portfolio management – that also provide potential to improve our positive impact in relation to Equality, Diversity and Inclusion outcomes. These are being integrated into the new investment process being introduced as a result.</p> <p>Together, the materials above have informed the review of the existing investment strategy and the development of the updated investment process from April 2024. This is highlighted in the Investment Strategy in the following sections:</p> <ul style="list-style-type: none"><li>◆ The Bank’s role as a mission-led impact investor, and how it enables impact – where specific reference is made of the need to tackle place-based inequality, and drive greater inclusion.</li><li>◆ The Bank’s role in the financial ecosystem, and its aim to unlock markets not currently benefitting sufficiently from investment and to invest for the wellbeing of the people of Scotland.</li><li>◆ The Bank’s investment approach which details its aims to invest in support of local communities and in line with its impact aims, ethical investment policy and equality strategy.</li></ul> <p>The strategy also highlights the Bank’s commitment to partnerships and engagement, and to annual impact reporting.</p>
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**Part 3: Public Sector Equality Duty**

<b>Does this proposal contribute to the Public Sector Equality Duty?</b>	The aim of the strategy is to ensure our investment strategy and processes are open, fair and transparent. This in turn forms part of our ambitions as a mission-led impact investor to drive prosperity and wellbeing for society and the economy in Scotland, with clear understanding of the role equalities (and inequalities) play in this and how we can incorporate those considerations.
<b>Does this proposal contribute to the Equality Outcomes?</b>	We have designed the investment strategy and developed our approach to enable us to embed equality of opportunity into our investment process and outcomes at every stage.

**Part 4: Recommendation**

<b>Will a full IIA (Step 2) be required?</b>	No negative impacts have been identified but we recognise the importance of the Strategy and that it will impact a range of external stakeholders.
<b>Please explain the reasons, in full, for the recommendation.</b>	<p>The work undertaken demonstrates that the Bank has comprehensively reviewed its investment strategy and processes and considered equalities and impact at all relevant stages. It builds on other work previously undertaken (such as the Equalities Impact Assessment undertaken alongside the Scottish National Investment Bank Bill) and also incorporates evidence from external insight and commissioned work to analyse Bank processes and impact. Where evidence exists that investment processes can incorporate actions and insights to improve equality of outcomes (such as in relation to gender and socio-economic diversity), this is clearly reflected in the updated investment strategy and process.</p> <p>The full analysis details how the Investment Strategy and associated processes may impact specific groups.</p>

<b>Completed by:</b>	Sandy MacDonald/ Rebecca Diggle
<b>Approved by:</b>	Scottish National Investment Bank PLC, Board of Directors
<b>Date:</b>	18 September 2024





## Step 2: Full impact assessment

### Purpose:

Step 2 should be completed where any potential impacts have been identified in Step 1. This should include consideration of mitigations and actions.

### Protected Characteristics:

Identify the Protected Characteristics that your Proposal affects and describe relevant mitigations and actions.

	Impact	Mitigations and Actions
<b>Age</b>	<p>No clear evidence has been identified that suggests age is a specific barrier to investment finance in Scotland, or that there are any specific negative impacts which require mitigation by the Bank.</p> <p>Evidence suggests however, that those aged 16 to 24 are more likely to be unemployed, financially vulnerable and in unmanageable debt and therefore in relative poverty than other age groups. These factors are likely to reduce the likelihood of people in this age group from undertaking entrepreneurial activity at the scale supported by the Bank.</p>	<p><b>No mitigation or specific action is required.</b></p> <p>The Bank does not currently, or intend to, collect investee data relating to age.</p>
<b>Disability</b>	<p>No literature on barriers to investment finance for individuals that have a disability specific to Scotland was found. However, specific to the UK, individuals with a disability noted their disability or having a health condition as a barrier to access finance support. Additionally, there is evidence to suggest that entrepreneurs that have a disability do not have equal access to opportunities compared to entrepreneurs that do not have a disability.</p> <p>Research suggests that intersectionality (e.g. presence of multiple characteristics) can further exacerbate barriers to investment finance.</p> <p>The Investment Strategy and associated processes are not considered to specifically impact this group, but this will be kept under consideration through increased data collection and more active monitoring.</p>	<p>The Bank is committed to continuously reviewing, and where appropriate widening, its EDI data collection practices. This includes a commitment to consider the collection of data relating to disability. The Bank will use this data to better understand the role disability may play in access to investment finance and whether its processes could/ should be amended to improve access.</p> <p>This is an area that will be actively monitored ahead of any further revision to the Investment Strategy and associated investment processes.</p>



	Impact	Mitigations and Actions
<b>Race</b>	<p>Research suggests that there is real and perceived discrimination and bias against ethnic minorities entrepreneurs, which can limit their access to investment finance. However, experiences are likely to vary across different minority groups.</p> <p>Literature suggests that the following may also act as barriers to accessing investment finance:</p> <ul style="list-style-type: none"> <li>◆ Lower investment activity and a greater tendency to avoid external financing than white counterparts.</li> <li>◆ Lack of awareness and trust and / or utilisation of available Scottish enterprise support programmes and provisions designed to support entrepreneurs.</li> <li>◆ Limited ethnic minority entrepreneurial role models and integration into mainstream ecosystem.</li> <li>◆ Entrepreneurial ecosystems are often found to be highly complex and difficult to navigate with generic and impractical support for ethnic minorities entrepreneurs.</li> </ul> <p>Research suggests that intersectionality (e.g. presence of multiple characteristics) can further exacerbate barriers to investment finance.</p> <p>The Investment Strategy and associated processes are not considered to specifically impact this group, but this will be kept under consideration through increased data collection and more active monitoring.</p>	<p>The Bank is committed to continuously reviewing, and where appropriate widening, its data collection practices. This includes a commitment to consider the collection of data relating to race within investee companies and specifically senior management and Boards. The Bank will use this data to better understand the role race may play in access to investment finance and whether its processes could/ should be amended to improve access.</p> <p>This is an area that will be actively monitored ahead of any further revision to the Investment Strategy and associated investment processes.</p>
<b>Religion or belief</b>	<p>No employment data per religion was found to be available nor literature on barriers or opportunities to access investment finance due to an individual's religion.</p> <p>The Investment Strategy and associated processes are not considered to specifically impact this group.</p>	<p><b>No mitigation or specific action is required.</b></p> <p>The Bank does not currently, or intend to, collect investee data relating to religion and belief.</p>



	Impact	Mitigations and Actions
<b>Sex</b>	<p>There is clear evidence that women are under-represented and systemically disadvantaged when accessing investment finance. Key barriers to access include:</p> <ul style="list-style-type: none"> <li>◆ Difficulty gaining acceptance in male dominated sectors and associated networks.</li> <li>◆ Discrimination and bias.</li> <li>◆ Lack of management education and managerial skills.</li> <li>◆ Less support for female entrepreneurship.</li> <li>◆ Women more likely to need to combine family responsibilities and work.</li> <li>◆ Rates of entrepreneurialism fall sharply for women after the age of 35 compared to men.</li> </ul> <p>Similar to other protected characteristics, intersectionality (presence of multiple characteristics) may further reduce women’s access to investment finance.</p> <p>Given the recognised systemic challenges faced by women in accessing investment finance the Bank has taken action to mitigate any unintentional biases in its processes through more conscious consideration of sex/gender through the investment cycle and ensuring women are part of the Bank’s investment decision-making. The new Strategy and processes reflect this and are intended to have a positive impact for this group.</p> <p>This will be kept under consideration through more active monitoring.</p>	<p>The Bank is committed to continuously reviewing, and where appropriate widening, its EDI data collection practices. This includes a commitment to consider the collection of data relating to sex/gender within investee companies and specifically senior management teams and Boards. The Bank will use this data to better understand the role sex/gender may play in access to investment finance and whether its processes could/should be amended to improve access.</p> <p>The Bank has also committed to a number of initiatives that are aimed at removing investment barriers and improving access to finance for women. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>◆ Becoming a signatory to the Pathways Forward Pledge.</li> <li>◆ Partnering with Women in Banking and Finance.</li> <li>◆ Becoming a signatory to Women in Finance Charter.</li> <li>◆ Sponsoring events aimed at widening participation.</li> <li>◆ Amending our investment processes to ensure women are always part of investment decision-making.</li> </ul> <p>This is an area that will be actively monitored ahead of any further revision to the Investment Strategy and associated investment processes.</p>
<b>Pregnancy and maternity</b>	<p>No literature on barriers to investment finance for pregnant individuals or individuals on maternity leave specific to Scotland was found. In the UK, primary and family care responsibilities are a key barrier for females to start a business and ensure the businesses success – see Sex.</p> <p>The Investment Strategy and associated processes are not considered to specifically impact this group.</p>	<p><b>No mitigation or specific action is required.</b></p> <p>The Bank does not currently, or intend to, collect investee data relating to pregnancy or maternity.</p>



	Impact	Mitigations and Actions
<b>Sexual orientation</b>	<p>There is insufficient evidence to determine whether sexual orientation adversely impacts on ability to access investment finance.</p> <p>The Investment Strategy and associated processes are not considered to specifically impact this group.</p>	<p><b>No mitigation or specific action is required.</b></p> <p>The Bank does not currently, or intend to, collect investee data relating to sexual orientation.</p>
<b>Gender reassignment</b>	<p>No literature was found on the barriers or opportunities to access investment finance based on gender reassignment status.</p> <p>The Investment Strategy and associated processes are not considered to specifically impact this group.</p>	<p><b>No mitigation or specific action is required.</b></p> <p>The Bank does not currently, or intend to, collect investee data relating to gender reassignment.</p>
<b>Marriage and civil partnership</b>	<p>Regarding marriage and civil partnership, the Public Sector Equality Duty covers this protected characteristic with regard to eliminating unlawful discrimination in employment. This Duty applies to the Bank in its determination of its human resources, recruitment and other policies which are out of the scope of this IIA.</p> <p>There is limited evidence on the impact of marriage and civil partnerships on barriers and opportunities to access investment finance.</p> <p>The Investment Strategy and associated processes are not considered to specifically impact this group.</p>	<p><b>No mitigation or specific action is required.</b></p> <p>The Bank does not currently, or intend to, collect investee data relating to marriage and civil partnership.</p>



**Socio-economic disadvantage:**

	<b>Impact</b>	<b>Mitigations and Actions</b>
<p><b>Socio-economic disadvantage</b> - features of socio-economic disadvantage include low income, low/no wealth, area deprivation and material deprivation.</p>	<p>Socio-economic disadvantage results in inequalities of outcomes such as poorer skills and educational attainment, lower healthy life expectancy, lower quality, less secure and lower paid work, greater chance of being a victim of crime and less chance of being treated with dignity and respect.</p> <p>Literature suggests that these factors, specifically income levels, are a barrier to entrepreneurial endeavours and indirectly access to investment finance. Additionally, individuals in rural and remote areas in Scotland were found to face greater socio-economic disadvantage due to a lack of economic activities/opportunities, highlighting place-based disparities.</p> <p>Evidence also suggests that socio-economic disadvantage is interconnected and highly intersectional with other protected characteristics. Addressing this issue, through policies and activities is therefore highly likely to have a positive impact on EDI and in turn reducing the barriers to investment finance for other protected groups.</p> <p>The Bank's Investment Strategy is designed to support the Bank's Place mission which seeks to reduce place-based inequalities. The outcomes of the Bank's investment activity are intended to contribute to reducing socio-economic disadvantage across Scotland, which over time should improve access to finance for groups that have historically been disadvantaged.</p>	<p>The investment process already considers place-based investment impacts within its impact assessment framework and will continue to do so to reduce place-based inequalities.</p> <p>Fair Work and EDI are also considered within the investment process with emphasis placed on supporting high quality employment through our investment activity, which should act to reduce socio-economic disadvantage.</p> <p>The Bank intends to review the EDI data that it collects throughout the investment process to include greater consideration of socio-economic disadvantage within investee companies and specifically senior management teams and Boards. The Bank will use this data to better understand the role socio-economic disadvantage may play in access to investment finance and whether its processes could/should be amended to improve access for currently disadvantaged groups.</p> <p>This is an area that will be actively monitored ahead of any further revision to the Investment Strategy and associated investment processes.</p>
<p><b>Low income / income poverty</b></p>	<p>See above.</p>	<p><b>See above - no separate mitigation or specific action is required.</b></p>
<p><b>Low and / or no wealth</b></p>	<p>See above.</p>	<p><b>See above - no separate mitigation or specific action is required.</b></p>
<p><b>Material deprivation</b></p>	<p>See above.</p>	<p><b>See above - no separate mitigation or specific action is required.</b></p>
<p><b>Area deprivation</b></p>	<p>See above.</p>	<p><b>See above - no separate mitigation or specific action is required.</b></p>
<p><b>Socio-economic background</b></p>	<p>See above.</p>	<p><b>See above - no separate mitigation or specific action is required.</b></p>



	Impact	Mitigations and Actions
<b>Looked after and accommodated young people and children</b>	No – N/A	N/A
<b>Carers</b>	No – N/A	N/A
<b>Homelessness</b>	No – N/A	N/A
<b>Those involved in the criminal justice system</b>	No – N/A	N/A

**Island communities:**

Impact	Mitigations and Actions
<p>Place-based regeneration, reduced inequality and improved outcomes for people and communities are at the heart of the Bank’s Place mission, which guides the Bank’s Investment Strategy.</p> <p>The Bank seeks to invest in communities across all of Scotland, including the Islands. Recognising the often-unique needs of the Islands, the Strategy allows the Bank to flex its investment principles to consider investment in the Islands that may otherwise not fit its standard investment criteria.</p>	<p>The Investment Strategy permits the Bank to flex its investment thresholds (e.g. make smaller investments) where investment demonstrates impact to smaller or remote communities within Scotland. This flexibility may positively affect smaller island communities who may have different investment opportunities (specifically scale of opportunities) than those found in more accessible and populated areas of Scotland.</p> <p>All investments are assessed for impact against the Bank’s missions and wider responsible investment framework. The Bank recognises that Islands may have specific community and locational needs not present in other parts of mainland Scotland. The Bank’s impact management framework used within the investment process is able to consider these and ensure appropriate measures are in place to support both the delivery of intended impact and mitigate any potential negative impacts resulting from investment activity.</p> <p>Evidence to date shows that where opportunities have arisen to invest for the benefit of island communities – for example in Orkney – this has been highlighted through the investment process and drawn out in the Impact Thesis and Theory of Change.</p>



Consultation:

<p><b>Have you undertaken any of form of consultation with any of the affected groups?</b></p>	<p>Yes - as part of wider activity.</p>
<p><b>Describe the consultation undertaken.</b></p>	<p>The Scottish Government undertook two large-scale consultations to support the development and launch of the Bank. These consultations, alongside more targeted stakeholder engagement, informed both the initial Equality Impact Assessment (EQIA) and revised EQIA published in 2019. These assessments were used to support the development of the Bank’s first Investment Strategy published in 2021.</p> <p>The Bank has subsequently consulted and engaged stakeholders in the development of its Equality Strategy (2022), which explicitly considers investment in businesses and projects, including equal access to finance.</p> <p>As part of our commitment to equal access to finance the Bank has to date largely focussed on sex and gender issues (as per the focus in the Bank Act) and supporting initiatives to tackle the under-representation of women accessing investment finance. The Bank has engaged widely on this issue to both better understand the current barriers to investment finance and how it can support improved access within the Scottish and UK investment ecosystem. This includes engagement with Pathways and a commitment to the Pathways Pledge.</p> <p>The Bank intends to refresh its Equality Strategy in 2025, and a large-scale consultation is planned to support this. This will include consulting on access to finance issues. The evidence collected through this engagement will be used to support any refresh to the Investment Strategy and associated investment processes.</p>
<p><b>Describe what data, information or other sources were taken into consideration.</b></p>	<p>In addition to the 2023 literature review (undertaken by a third-party consultancy firm) on access and barriers to investment finance in Scotland, all of the evidence and learning gathered through the above consultations, EQIAs and on-going engagement have informed the Bank’s EDI’s priorities and revised 2024/25 Investment Strategy.</p>
<p><b>Are any changes or improvements suggested to the Proposal because of any consultation or other data sources? Please explain.</b></p>	<p>The proposal includes specific reference to the Bank’s ability to flex its standard investment principles to account for the specific investment needs of smaller and remote communities in Scotland (inc Island communities).</p> <p>The Strategy and associated investment processes have been reviewed and amended to support the Bank’s EDI objectives. Specifically, the planned changes to the Bank’s EDI data collection will provide evidence to better understand access to finance issues for specific groups and allow the Bank to further amend its strategy and process to address any issues identified.</p>
<p><b>If applicable, explain why your Proposal should go ahead despite the negative impacts identified.</b></p>	<p>No negative impacts have been identified.</p>



<p><b>How will the impact of the Proposal be monitored, including implementation of any amendments? I.e., practical arrangements for monitoring, frequency, responsible party.</b></p>	<p>The Investment Strategy and the supporting processes will be regularly reviewed within the Bank’s internal governance processes. The Strategy will be updated as and when required to both address new investment priorities and to account for new evidence in relation to supporting our access to finance objectives (see Equalities Strategy).</p> <p>EDI data collected through the investment process will be regularly reviewed by the Bank’s impact team and will form part of the Bank’s impact and EDI reporting. The data collected and subsequent data analysis will inform any future revisions to the strategy.</p>
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**Final Recommendation:**

<p><b>Implement Proposal with no amendments.</b></p>	<p>Yes</p>
<p><b>Implement Proposal taking account of mitigating actions set out in this form.</b></p>	<p>Yes – see intention to widen EDI data collection to support EDI priorities.</p>
<p><b>Proposal shall not be implemented.</b></p>	
<p><b>Please, briefly, set out reason for recommendation.</b></p>	<p>The 2024 Investment Strategy and associated investment processes take account of the Bank’s EDI priorities. They have been refreshed to enable the Bank to collect and consider a wider sub-set of EDI data/evidence within the investment process and participate in wider industry EDI initiatives designed to improve access to finance for currently under-represented groups (e.g. Pathways Pledge).</p>

**Sign-off**

<p><b>Proposal Title:</b></p>	<p>Investment Strategy – Financial Year 2024/25</p>
<p><b>Delivery Team:</b></p>	<p>Investment – Impact</p>
<p><b>Assessment Completed by:</b></p>	<p>Sandy MacDonald / Rebecca Diggle</p>
<p><b>Date:</b></p>	<p>August 2024</p>
<p><b>Approved by:</b></p>	<p>Scottish National Investment Bank PLC, Board of Directors</p>
<p><b>Date:</b></p>	<p>18 September 2024</p>





# The Scottish National Investment Bank

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