



## **Disability Equality Scheme 2010–13**

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## **Foreword by the chief executive**

I am pleased to present SQA's Disability Equality Scheme for 2010–13.

SQA places equality at the heart of its operations. We are deeply aware of our responsibilities towards our staff and all our stakeholders and, most importantly, individual learners who have additional support needs.

Education and training are at the heart of Scotland's heritage and culture. Education and training unlock potential, and bring benefits to all of us and to the communities we live in. Qualifications are how we show what we have achieved in education and training.

Disability equality is particularly important to SQA, and we continue to focus our energies on developing the widest possible access to our qualifications.

Our commitment to equality is enshrined in our core values — quality, integrity, innovation, partnership and service — and we recognise that equality needs to be made explicit in all aspects of our work. We welcome our Disability Equality Duty, and continue to strive to make improvements, where needed, in the level of service we offer.

This Disability Equality Scheme will guide the work that we do to integrate disability equality further into our planning and decision-making. This Scheme sets out our framework for making a positive change to the lives of disabled people by promoting disability equality in all our practices, policies and procedures.

This scheme reflects existing legislation. It will be reviewed and modified to take account of changes in legislation.

**Dr Janet Brown**  
**Chief Executive**

# 1 Background

- 1.1 The Scottish Qualification Authority (SQA) is committed to disability equality.
- 1.2 This document is SQA's Disability Equality Scheme (DES or Scheme) for 2010–13. It replaces the earlier version (2007–09) and has been comprehensively reviewed and fully re-written. With this Scheme, SQA aims to demonstrate how it proposes to comply with its obligations under the statutory disability equality duty.
- 1.3 SQA is committed to reviewing and enhancing its obligation to promote disability equality.
- 1.4 SQA is guided by a number of principles. These include:
- ◆ Work in partnership with stakeholders and SQA centres to ensure that all candidates enjoy equality of access to our qualifications.
  - ◆ Develop worthwhile qualifications, based on national standards, which are accessible to candidates who have the potential to achieve them.
  - ◆ Develop valid, reliable and credible assessments, and effective quality assurance processes, which are sensitive to the needs of individual candidates, but which do not compromise our overall aims of fairness and consistency.
  - ◆ Ensure that standards and assessments for SQA qualifications are clearly written and fit for purpose, and are not discriminatory.
  - ◆ Make access to assessment as open as possible by allowing reasonable adjustments to our published assessment arrangements in response to individual needs, so long as they are consistent with national standards.
  - ◆ Do more than simply comply with our duties under legislation in areas such as discrimination and support for learning.
  - ◆ Embed equality in all our activities.
  - ◆ Make our website and publications accessible to all users.
  - ◆ Create a culture where everyone is treated on an equal basis.
  - ◆ Discrimination — direct or indirect — is unjust and will not be tolerated.
  - ◆ Ensure that our suppliers and partners comply with the requirements of the DDA.

## 2 The Disability Discrimination Act 1995

- 2.1 The Disability Discrimination Act 1995 (hereafter the Act) places a number of obligations on SQA, both as an employer as a public body and as a General Qualifications Body.
- 2.2 SQA takes its statutory responsibilities under the Act very seriously.
- 2.3 This Scheme is particularly concerned with SQA's duty under section 49A of the Act. This requires SQA, when carrying out its functions, to have due regard to:
- a) the need to eliminate discrimination that is unlawful under this Act
  - b) the need to eliminate harassment of disabled persons that is related to their disabilities
  - c) the need to promote equality of opportunity between disabled persons and other persons
  - d) the need to take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons
  - e) the need to promote positive attitudes towards disabled persons
  - f) the need to encourage participation by disabled persons in public life
- 2.4 Disability is defined within the Act, and statutory guidance has been issued to explain the definition:
- 'a physical or mental impairment, which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.' The effects of medical or other treatments or aids and appliances should be ignored when considering whether someone is disabled.
- 2.5 Some of the terms should be explained:
- ◆ 'physical impairment' includes sensory impairments
  - ◆ 'mental impairment' includes learning difficulties and an impairment resulting from or consisting of a mental illness
  - ◆ 'substantial' means 'more than minor or trivial'
  - ◆ 'long term' is defined as 12 months or more
- 2.6 The definition includes a wide range of impairments. These include some that are relevant to the field of education, such as: specific learning difficulty (including dyslexia), speech and language impairments, autistic spectrum conditions, and attention deficit hyperactivity disorder (ADHD). These may amount to a disability, but only if the effect on a person's ability to carry out normal day-to-day activities is substantial and long term, as defined above.

2.7 Some progressive conditions, such as cancer, multiple sclerosis and HIV/AIDS, are included before they have an effect on a person's ability to carry out normal day-to-day activities. Some conditions are excluded from the Act.

2.8 Day-to-day activity should involve one of the following areas of activity:

- ◆ mobility
- ◆ manual dexterity
- ◆ physical coordination
- ◆ continence
- ◆ ability to lift, carry or otherwise move everyday objects
- ◆ speech, hearing or eyesight
- ◆ memory or ability to concentrate, learn or understand
- ◆ perception of risk of physical danger

### **3 The role of SQA**

3.1 SQA is an executive non-departmental public body (NDPB) sponsored by the Scottish Government Schools Directorate. It is the national body in Scotland responsible for the development, accreditation, assessment and certification of qualifications other than degrees.

3.2 The statutory basis for SQA can be found in the Education (Scotland) Act 1996.

3.3 SQA's key functions are to:

- ◆ devise, develop and validate qualifications, and keep them under review
- ◆ accredit qualifications
- ◆ approve education and training establishments as being suitable for entering people for these qualifications
- ◆ arrange for, assist in, and carry out, the assessment of people taking SQA qualifications
- ◆ quality assure education and training establishments which offer SQA qualifications
- ◆ issue certificates to candidates

3.4 SQA qualifications include:

- ◆ National Qualifications
- ◆ Higher National Certificates and Diplomas (HNC/HND)
- ◆ Scottish Vocational Qualifications (SVQs)
- ◆ Customised Awards and Professional Development Awards

SQA is also responsible for developing and distributing 3-15 National Tests to schools as part of the Government's Curriculum for Excellence Programme.

3.5 A comprehensive list of SQA functions and current corporate goals can be found in SQA's Corporate and Business Plan, which is reviewed annually and approved by Scottish Ministers. This is available on the SQA website at [http://www.sqa.org.uk/sqa/files\\_ccc/Corporate\\_Plan\\_2009-12.pdf](http://www.sqa.org.uk/sqa/files_ccc/Corporate_Plan_2009-12.pdf).

## 4 The involvement of disabled people in this scheme

- 4.1 The involvement of disabled people is essential to ensuring equality schemes are relevant to SQA's functions and its duties under the Act. SQA places considerable importance on regular and meaningful consultation and dialogue with disability groups, and disabled individuals.
- 4.2 SQA is obliged to involve disabled people who have an interest in the way it carries out its functions in the development of the DES<sup>1</sup>, and to include a statement of the ways in which disabled people have been involved in its development.<sup>2</sup>
- 4.3 During the process of involving disabled people and groups, SQA has attempted to focus their involvement to consider the following:
- ◆ identifying barriers faced by disabled people and unsatisfactory outcomes
  - ◆ setting priorities for the action plan
  - ◆ assisting planning activity
- 4.4 SQA intends to involve disabled people in the implementation and monitoring of this Scheme. SQA considers this critical to the successful and meaningful implementation of the disability equality duty.
- 4.5 The involvement of disabled people has followed the statutory guidance, in that there has been more than consultation — there has been 'involvement', based on the following key principles:
- ◆ Focused involvement: SQA has strived to identify its ability to make changes and the aspects of its functions that most affect disabled people.
  - ◆ Accessible involvement: as wide a range of disabled groups as possible have been involved.
  - ◆ Proportionate involvement: SQA has sought to balance the needs of proper dialogue with a measured and proportionate effort to ensure value for stakeholders.
  - ◆ Influential involvement: SQA has taken the concerns of disabled people and groups and used them as the starting point and key themes for the development of this Scheme.

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<sup>1</sup> Regulation 2 (3) (a) The Disability Discrimination (Public Authorities) (Statutory Duties) (Scotland) Regulations 2005 2005/565

<sup>2</sup> Regulation 2 (3) (a) The Disability Discrimination (Public Authorities) (Statutory Duties) (Scotland) Regulations 2005 2005/565

- ◆ Transparent involvement: to ensure all disabled people are aware of the level of involvement that has taken place, this section of the DES lays out in detail which groups have been involved.

4.6 SQA has involved representative groups to understand as well as possible the dynamics of disabled service users, and their other needs, in a variety of contexts. SQA has also attempted to liaise, and enter into a dialogue, with individual disabled people.

4.7 SQA will continue to consider, when appropriate, the commissioning of research in the community, into the impact particular aspects of SQA's functions may have on disabled people.

4.8 SQA has created an Inclusion Group to ensure that its products and services are inclusive. The Group has a broad remit of inclusion and equality of opportunity.

4.9 SQA is committed to listening to and incorporating the views of disabled people on relevant aspects of the organisation's functions.

4.10 SQA has been involved with various organisations, groups and individuals in recent years before the production of this Disability Equality Scheme. These include:

- ◆ DeafUK
- ◆ The Scottish Sensory Centre
- ◆ Scottish Accessible Information Forum
- ◆ A variety of British Sign Language training providers and associated organisations
- ◆ British Deaf Association
- ◆ Scottish Council on Deafness (SCoD)
- ◆ Scottish Association of Sign Language Interpreters (SASLI)
- ◆ Communication Aids for Language and Learning (CALL Scotland)
- ◆ Royal Blind School
- ◆ A variety of regional Sensory Impairment services
- ◆ Scottish Government Linguistic Access Group
- ◆ Cross Party Group on Dyslexia
- ◆ HMIE Dyslexia Reference Group
- ◆ Signed Translation Reviewers Group (Formerly the Deaf Review Group)
- ◆ Focus Group on assessment issues for those with Autistic Spectrum Conditions
- ◆ Individual members, of the public through SQA's equality mailbox and by way of registering interest on the equalities web pages.
- ◆ Individual Service Users

## 5 The steps to be taken by SQA

- 5.1 SQA must include a statement of the steps that it proposes to take to ensure fulfilment of the general disability equality duty within the period covered by this Scheme.<sup>3</sup> This document is known as the Action Plan and is attached in Appendix A to the Scheme.
- 5.2 The Action Plan sets out the key actions which SQA intends to take to promote disability equality. It is not a fully comprehensive document; SQA will continue to work across many areas to strengthen its commitment to disability equality, however the Action Plan sets out the key commitments and priorities for the period 2010-13.
- 5.3 Appropriate weight is given to each of the different strands of the disability equality duty as laid out in paragraph 2.3 above.
- 5.4 The actions identified to be taken in SQA's action plan take account of the needs of disabled people who are potential service-users, employees and volunteers as well as those existing ones. It is hoped the Action Plan reflects:
- ◆ the priorities of the disabled people and group consulted in recently
  - ◆ the strategic priorities of SQA
  - ◆ specific outcomes which SQA wishes to achieve
  - ◆ lines of accountability
- 5.5 SQA believes the DES will strengthen the organisation's ability to work towards disability equality from a number of different perspectives.
- 5.6 SQA will take into account the Scottish Minister's reports in relation to the identification of areas in which actions need to be taken.
- 5.7 The Action Plan is SQA's second Action Plan. Some of the 'actions' from the first Action Plan have been carried over, partly because of the considerable number of actions identified in the first ever DES; partly because many are currently being implemented and the on-going progress should be represented in this second DES; and lastly because organisational change within SQA has meant that completing some actions within the timescales was impracticable.
- 5.8 As SQA is a large organisation, it is continuing to monitor and review its existing and new policies. This is an on-going process. All new policies are automatically checked for compliance with the disability equality duty and their relevance for an equality impact assessment.

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<sup>3</sup> Regulation 2 (3) (c) The Disability Discrimination (Public Authorities) (Statutory Duties) (Scotland) Regulations 2005 2005/565

## **6 SQA and the arrangements for gathering information**

6.1 The DES must include a statement of SQA's arrangements for gathering information on the effect of its policies and practices on disabled people.<sup>4</sup> In particular, SQA must set out arrangements for gathering information on the effect of its policies and practices on the recruitment, development and retention of its disabled staff.<sup>5</sup>

6.2 SQA readily accepts that the gathering of information is not an end in itself, but that the information gathered must be analysed and considered. The results of the information are fed back into the management of the organisation to ensure regard is given to the disability equality duty. The information obtained is used to identify the objectives for the Action Plan and to inform the contents of the DES.

6.3 This section describes SQA's arrangements for making use of the information gathered in these ways, and in particular its arrangements for reviewing, on a regular basis, the effectiveness of the Action Plan and subsequent Schemes.<sup>6</sup>

### **Gathering information**

6.4 Records are kept of assessments, examinations, applications for additional arrangements etc. SQA also uses a number of different means of compiling information, such as:

- ◆ staff surveys
- ◆ service user surveys
- ◆ feedback from staff network groups
- ◆ analysis of complaints
- ◆ research findings

6.5 In particular SQA keeps records of:

- ◆ the number of candidates sitting external assessments
- ◆ candidates with a disability and/or additional needs who use assessment arrangements
- ◆ candidates with a disability and/or additional needs whose specific requests have not been approved.
- ◆ the number of disabled staff employed

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<sup>4</sup> Reg. 2 (3) (d) The Disability Discrimination (Public Authorities) (Statutory Duties) (Scotland) Regulations 2005 2005/565

<sup>5</sup> Regulation 2 (3) (d) (i) The Disability Discrimination (Public Authorities) (Statutory Duties) (Scotland) Regulations 2005 2005/565

<sup>6</sup> Regulations 2 (3) (e) (i) and (ii) The Disability Discrimination (Public Authorities) (Statutory Duties) (Scotland) Regulations 2005 2005/565

- ◆ the number of applications for employment with SQA from disabled people.

6.6 SQA is committed to using this information to identify the range of barriers disabled people might face both as employees and service users. The information obtained is collated and analysed.

### **Gathering information in relation to employees**

6.7 SQA employs 692 staff and regularly recruits new employees. The current percentage of staff with a disability is 2.2.

6.8 SQA is obliged to collect information in relation to its employees and applicants for SQA positions in relation to:

- ◆ the effect of policies on recruitment
- ◆ the training of disabled staff
- ◆ the retention of disabled staff

6.9 SQA's human resources department collects this information. SQA monitors this information and its effects on employment and recruitment. Reports are reviewed by SQA's Director of HR.

6.10 Information in relation to 'recruitment' will normally include information relating to both successful and other applicants for posts.

6.11 In relation to 'development', information is collected in relation to: who applies for training; who is offered training; the type of training; performance reviews; workplace benefits and facilities; harassment; discrimination, grievance and disciplinary action.

6.12 Information in relation to 'retention' normally includes termination of employment (to include: redundancies, resignations, dismissals etc).

6.13 SQA aims to deploy strategies and approaches to ensure applicants and employees feel confident to disclose and discuss disability issues. SQA explains why disability related information is requested and recorded.

### **Information on services and functions to take account of disabled people's needs**

6.14 SQA is obliged to gather information on the extent to which its services and functions take account of the needs of disabled people. To this end, SQA is attempting to narrow the gap in outcomes between disabled people and non-disabled people.

6.15 SQA will continue to review and consider the full range of services it provides to ensure information is gathered for all relevant services including disability specific services.

- 6.16 SQA is committed to using qualitative and quantitative information gathering techniques in this area. It will normally seek to ensure in relation to information sources that disabled people are properly represented in customer surveys and focus groups and that any such information is normally analysed to consider whether there is a difference in satisfaction levels between disabled and non-disabled groups.
- 6.17 If possible, SQA will try to analyse and break this information down by impairment type.
- 6.18 SQA will also try to assess the extent to which services are accommodating the needs of disabled service-users by both monitoring the proportion of staff who have/are receiving disability equality training and by considering qualitative research into specific disability-related issues.

### **Using the information**

- 6.19 The information gathered through the processes described above will be used to monitor the effectiveness of the DES and the Action Plan targets, as well as the relevance of the targets over time. The information obtained will also inform SQA's annual equality review, the next DES, and the continual process of identifying relevant Action Plan targets.

## 7 SQA's approach to equality impact assessments

### Introduction

- 7.1 SQA must include a statement in this Scheme of its methods for assessing the impact of its policies and practices, or the likely impact of its proposed policies and practices, on equality for disabled people.<sup>7</sup>
- 7.2 Equality impact assessment is the process of assessing the impact of existing or proposed policies and practices in relation to their consequences for disability equality. It includes looking for opportunities for positive impact, as well as detecting actual or potential negative impact for disabled people. It remains, for SQA, an on-going process. SQA considers it important to note that impact assessment is not an end in itself, but a tool to help ensure that there are improvements for disabled people. SQA will monitor the outcome of impact assessments and keep them under review.

### Policies and practices

- 7.3 Given the central role of impact assessments to the disability equality duty, SQA recognises it must ensure they are implemented when relevant across as wide an interpretation of 'policies' and 'practices' as possible.
- 7.4 For the purposes of this DES, SQA interprets 'policy' widely, therefore. This includes:
- ◆ recruitment strategy and procedures
  - ◆ employee terms and conditions
  - ◆ performance management systems
  - ◆ assessment design
  - ◆ additional arrangements for assessments
  - ◆ procurement strategy and procedures
  - ◆ complaints procedure
  - ◆ rules covering the entitlement and payment of expenses
  - ◆ relocation plans
  - ◆ communication strategies
  - ◆ budget setting decisions and criteria for resource allocation
  - ◆ methods for providing information to staff and service users

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<sup>7</sup> Regulation 2 (3) (b) The Disability Discrimination (Public Authorities) (Statutory Duties) (Scotland) Regulations 2005 2005/565

- 7.5 SQA policies are approved by SQA's Executive Team. All staff involved in policy-making must be aware of, and trained in, the need to consider equality impact assessments.
- 7.6 A review of an existing policy can bring about material changes. SQA is mindful of the need to consider a disability equality impact assessment when a policy is reviewed.
- 7.7 As a result of the size of SQA, the process of carrying out equality impact assessments on existing and new policies is on-going. The Action Plan for this period will prioritise those policies which require to be considered for the purposes of disability equality impact assessment. Moving forward, SQA hopes disabled people may be involved in the process of prioritisation.
- 7.8 Each department will be responsible for identifying those policies which require to be considered for disability equality impact assessment. The Equalities Project Officer will collate this information, and it will be monitored by the Director of Corporate Governance who will report to the Board. SQA will ensure resources are provided for this process to be undertaken.
- 7.9 As a result of the size of SQA, it does need to impose tests of reasonableness and proportionality when considering which policies are to be prioritised for disability impact assessment and which policies will require to be the subject of a full disability equality impact assessment.
- 7.10 SQA has in place procedures for ensuring all new policies are automatically considered for disability equality impact assessment. The Equalities Project Officer co-ordinates the departmental responses, and reports to the Director of Corporate Governance in this regard.
- 7.11 SQA is also mindful of the need to review its criteria for enabling it to determine the relevance of disability equality impact assessments:
- ◆ where a policy is a major one in terms of scale or significance
  - ◆ where, although a policy is a minor one, whether it is likely to have a disproportionate impact on disabled people, and to further consider (even where relatively few disabled people might be affected) whether the impact could be considered to be particularly negative for a particular group of disabled people
  - ◆ for day-to-day decisions

### **Who carries out impact assessments?**

- 7.12 As a starting point, a member of the business area responsible for the policy or practice must be involved in the initial screening as to the relevance of an equality impact assessment, and in liaison with the

Equalities Project Officer and, if required, with the Director of Corporate Governance.

- 7.13 At times, a member of SQA staff from another department will be involved in screening a policy to consider whether a disability equality impact assessment is required. This will be considered where the policy is of considerable importance and central to SQA's functions; where the policy may have an impact on disabled people but there are concerns regarding reasonableness, proportionality, timing and cost and in other circumstances where it would be considered helpful or good practice.
- 7.14 SQA deploys a flexible approach to the question of who should carry out a full disability equality impact assessment.
- 7.15 SQA will consider whether it is relevant to consult with disabled people in an equality impact assessment. This would normally be considered where it is likely the involvement of disabled groups or people will add value or where SQA is to carry out an impact assessment in a relatively new or unknown area. The Authority will consider the reasonableness and proportionality of involving disabled people and groups in the carrying out of equality impact assessments.

### **Carrying out disability equality impact assessments**

- 7.16 SQA is committed to ensuring the focus of its disability equality impact assessments is on outcomes and not process.
- 7.17 SQA has an equality impact assessment toolkit. This is used on occasion, but it is important that SQA and its staff remain flexible in the approach they take. Each policy, and each possible equality impact assessment, is different, and SQA wishes to use a number of methods to ensure careful thought is given to individual approaches, rather than the organisation becoming overly reliant on a set way of doing things.
- 7.18 The core of the disability equality assessment is to systematically consider a number of disability related issues as part of SQA's policy making.

### **Screening for full assessment**

- 7.19 SQA has to consider, because of the size and complexity of its operations, whether a full disability equality impact assessment is required in relation to its policies and practices. SQA follows the statutory guidance given, ie that a full equality impact assessment is likely to be required if:
- ◆ a policy is a major one in terms of the scale or significance for SQA's activities

- ◆ there is a clear indication that, although a policy is a minor one, it is likely to have a major impact on disabled people — in terms either of numbers affected or the seriousness of the likely impact, or both

7.20 SQA staff therefore need to consider whether policies fall into either of these categories, and whether it looks likely that a full disability equality impact assessment is required. There will, at times, be additional considerations, such as proportionality and reasonableness, that will have to be weighed up.

7.21 SQA has reviewed the criteria to be used to address the points outlined in paragraphs 7.19 and 7.20 above. This is an area of priority for the new Action Plan. The exact criteria are based upon the following key consideration:

- ◆ number of people affected
- ◆ the nature of the policy's impact on people and the significance and consequence of the policy on people's lives
- ◆ scale
- ◆ cost
- ◆ the 'profile' of the policy (the sensitivity of the policy)

7.22 As a result of the size of SQA, the screening process will be undertaken within departments or business areas. Equality co-ordinators will assess their policies against the new criteria to determine which policies may need to be assessed. This will be done in liaison with the Equalities Project Officer. Training will be provided to departmental co-ordinators. The Director of Corporate Governance will monitor this process, and the Board will have an overview responsibility.

7.23 All decisions will be briefly documented and explained. The factors that are relevant to the decision should be explained.

### **Full assessment**

7.24 The following key questions (taken from the statutory guidance) should be explored by the official involved in carrying out a full disability equality impact assessment. A report must be produced in relation to the assessment and it should normally involve reference to these questions:

- ◆ What kind of disability equality impact might there be?
- ◆ How significant is it in terms of its nature and the number of people likely to be affected?
- ◆ For which groups of disabled people will there be an impact?
- ◆ Is the impact positive, negative, or both?
- ◆ What aspect of the disability equality duty will, or might, be affected?
- ◆ Could the impact constitute unlawful disability discrimination?

- ◆ What further information is required to gauge the probability and extent of the impact?
- ◆ Where and how can that information be obtained?
- ◆ What does all the evidence tell SQA about the probable impact on disability equality?
- ◆ What action needs to be taken to reduce a negative impact?
- ◆ What action needs to be taken to increase the positive impact?
- ◆ If the action will not fully mitigate the adverse consequences for disability equality, or no action is to be taken, why is this and can it be justified?
- ◆ How will SQA know what the impact, in practice, of the proposed policies, or of changes introduced, has been?
- ◆ What has been learned from the disability equality impact assessment process?

7.25 The process of considering these questions will help SQA to structure and identify the nature of the equality impact assessment. The following stages should then normally be considered when conducting an assessment:

- ◆ assembling the evidence
- ◆ judging impact
- ◆ planning action
- ◆ implementation of actions plans
- ◆ monitoring and review
- ◆ publication

7.26 Assembling evidence can, at times, require SQA to conduct research or draw on its resources to obtain fresh quantitative or qualitative evidence in relation to the particular issue that is the subject of the impact assessment. Often, SQA will be able to consider the evidence from existing sources, both internal to SQA and external. SQA is aware that governments, local authorities, non-governmental bodies, charities and other organisations hold a wealth of statistical evidence. All sources should be used to ensure a cost-effective but rigorous approach to evidence gathering.

7.27 If existing sources of evidence are incomplete or inadequate, SQA will consider obtaining evidence by:

- ◆ surveys and questionnaires
- ◆ interviews and focus groups
- ◆ secondary sources and data reviews
- ◆ observations
- ◆ desk research

- ◆ panels
- ◆ existing diversity monitoring forums
- ◆ staff groups

- 7.28 SQA is aware that the collection of relevant data can be time consuming. This should not affect SQA's commitment or approach to disability equality impact assessment. In the interim, whilst the impact assessment is underway, SQA will normally consider what policy should be used. This may involve continuing to rely on the existing policy; implementing an interim policy; or trial running or piloting a proposed new policy. SQA will approach such decisions carefully, on a case-by-case basis. Relevance and proportionality are again relevant to this area.
- 7.29 Once the data has been gathered, SQA will begin assessing impact and planning action; this will be done in the context of SQA's statutory disability discrimination and equality duties.
- 7.30 Consideration must be given to positive and negative impacts; to the full range of disabilities; and to questions of justification and proportionality. The reviewing official, or team, will have to consider whether a particular policy can be amended to achieve disability equality objectives, or whether an entirely new policy is required. It may be that a pilot policy will be required in the first place, to trial an amended policy or before the implementation of a proposed new one. A careful track will always be kept of changes. Decision making and evidence must always be properly documented.
- 7.31 The assessment must then be implemented. SQA is committed to ensuring disability equality impact assessments are not 'paper' exercises. A clear statement of the changes and improvements should be made, or a clear statement of why no changes are required or are disproportionate, not relevant or not practicable.
- 7.32 Consideration should normally be given at this stage to the identification of barriers to disabled people that are beyond SQA's remit.
- 7.33 Monitoring and reviewing should then take place in relation to two distinct parts of the process: the disability equality impact assessment, and the outcome of the assessment. In order to be meaningful, both should normally be the subject of review. SQA is committed to learning from its equality impact assessments.
- 7.34 Consideration will also be given to publication of the disability equality impact assessment. This may be by way of a summary in the annual equality report, or may be a full scale publication of a report on the equality impact assessment.

### **Mainstreaming the process in SQA**

- 7.35 SQA is committed to viewing equality impact assessments as an integral part of the administration, management, policy development and strategic thinking that makes up the organisation. It is not a 'bolt on'.
- 7.36 To that end, SQA's Board has an oversight role in relation to disability equality impact assessment, and the Chief Executive will normally be involved in the important decisions. The Director of Corporate Governance is responsible for this area and regularly reports to the Board on this issue.
- 7.37 Major policy changes or new policies will normally be presented to the Board with a statement in relation to disability equality.

## Appendix A: Disability Equality Scheme: Revised Action Plan 2010–13

Ref	Actions	Responsibility	Timescale	Outcome(s)
<b>Equality in Service Delivery (Qualifications &amp; Assessment)</b>				
1	When developing new and reviewing existing qualifications, continue to build in effective review processes to ensure there are no unintended barriers to access for disabled learners	Qualifications Directorate	On-going	To remove any barriers not related to competence standards to ensure qualifications are accessible to all learners who have the potential to achieve them.
2	Ensure assessments do not exclude or discriminate against learners on disability grounds	Qualifications Directorate/ Operations	On-going	Assessment materials are appropriate for all learners
3	Ensure guidance is regularly reviewed to provide advice on subject-specific areas to assist centres to make appropriate provision	Policy and New Products	On-going	Reviewed and updated Assessment Arrangements Resource Pack
4	Develop and improve methods of communicating and engaging with disabled learners	Qualifications Directorate	2010–11 and on-going	Improved understanding of the nature and extent of issues facing disabled people by gathering relevant data and information. Including consultations, research, data collection and monitoring. (SQA will use the information we gather to inform the development and delivery of our policies.)
5	Review stakeholder database to ensure contacts are up to date and new contacts are added	Policy and New Products/ Legal Services	2009–10 and on-going	Valid and reliable stakeholder database of contacts
6	Monitor the effectiveness of reasonable adjustments made for disabled people and act on findings of review	Policy and New Products	2010–11 and on-going	Effective and robust procedures in place for reasonable adjustments
7	Deliver SQA's disability equality event for access to Physical Education in January 2010	Policy and New Products	January 2010	Exemplify good working practices and support those delivering PE courses to disabled candidates.
8	Review SQA's equalities web pages and internal Legal Services portal for staff	Legal Services	April 2010 and on-going	SQA's equalities web pages contain current information and report progress against our equality schemes and action plans. Raise the profile of disability equality and the Public Sector Equality Duties to all staff.

Ref	Actions	Responsibility	Timescale	Outcome(s)
9	Continue involvement to support the Office for the Commissioner for Public Appointments in Scotland in the implementation of the first equal opportunities strategy for public appointments in Scotland, <i>Diversity Delivers</i> .	Corporate	On-going	Ensure that SQA's committees are fully representative and reflect the diversity of Scotland's population
10	Continue to improve the accessibility of SQA's website	Web team/ IT	On-going	SQA's website is accessible for all users.
11	Promote equality of opportunity by ensuring marketing literature is available in a variety of accessible formats	Marketing	On-going	Publications are accessible to all.
12	Review marketing plans and ensure SQA promotes equality through marketing materials	Marketing	On-going	Ensure publications/marketing campaigns reflect positive images of all members of society
13	Publish and communicate policy on adapted formats.	Marketing	June 2010	SQA's policy on adapted formats accessible to all staff.
14	Ensure monitoring arrangements are in place to assess whether suppliers are compliant with SQA's pre-qualification questionnaire (PQQ) which makes clear to suppliers our equality requirements	Procurement	2010–13 and on-going	SQA's contracts governed by a robust equality framework and service providers fully aware of and comply with the requirements of the DDA.

Ref	Actions	Responsibility	Timescale	Outcome
<b>Equality in Employment (HR &amp; Appointees)</b>				
15	Ensure appropriate disability equality training is provided to staff.	Human Resources	2010–11 and on-going	Staff understand their roles and objectives under the equality duties and wider equality legislation.
16	Continue to review and analyse data collected as part of SQA's workforce monitoring exercise	Human Resources	2010–11 and on-going	Information used to develop policy and enhance staff training.
17	Continue to ensure disabled staff are fully supported in all areas of their employment	Human Resources	On-going	Effective procedure in place to provide reasonable adjustments for disabled staff
18	Review personal data collected on Appointees	Appointee Management	December 2010	(If required, to hold and make use of information on disability.)
19	Review training requirements for Appointees	Appointee Management	2010–11 and on-going	Appointees consistent in their application of responsibilities and aware of SQA's assessment arrangements for candidates with disabilities and/or additional support needs.
20	Monitor implementation of SQA's revised DES and improve communication of the Disability Equality Duty (Public Duties) and responsibilities under the DDA 2005.	Marketing Communications Corporate Legal Services	2010–13 and on-going	Raise awareness of the importance of the DED to all staff through All Staff Briefings and staff newsletter to highlight SQA's role in promoting equality of opportunity and eliminating discrimination.

## Equality Impact Assessments (EqIAs)

Ref	Action	Responsibility	Timescale	Outcome(s)
	Identify an Equality Co-ordinator in relevant parts of the business (Equality Co-ordinator: EC)	Legal Services/ Equality Co-ordinators	2010–13 and on-going	<ol style="list-style-type: none"> <li>1. Robust and transparent equality impact assessment process in place</li> <li>2. Clearly defined and up to date list of policies functions and strategies prioritised for EqIA</li> <li>3. Staff/ECs equipped with the skills they need to carry out equality impact assessments</li> <li>4. All disability relevant policies impact assessed and reports published, where required.</li> <li>5. SQA's EqIA process mainstreamed as part of business planning, ensuring that an EqIA is carried out on all new policies and results used effectively to influence policy development.</li> </ol>
	Provide equality training to each Equality Co-ordinator			
	ECs to prepare list of policies and assess high, medium, low priority: <ol style="list-style-type: none"> <li>1 no disability issues</li> <li>2 possible disability issues</li> <li>3 definite disability issues</li> </ol>			
	Finalise programme of equality impact assessments			
	Equality impact assessment pre-meetings to take place between the ECs and SQA's equalities project officer to discuss policy list			
	Equality impact assessments to be carried out for policies identified			
	Documentation and evidence (if necessary) to be prepared in relation to those policies which do not require equality impact assessments.			
	EqIA reports/actions to be recorded and incorporated in SQA's equality action plan and business area operational plans			
	Equality impact assessment forms to be added to each new policy or review of an existing policy to consider compliance with SQA's DES.			