

Disability Equality Scheme 2007–09

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Foreword by the Interim Chief Executive

Education and training is 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.

SQA is deeply aware of its responsibilities in this area, both towards stakeholders (such as colleges and universities) and, even more importantly, to individual learners.

We know that we have to work with education, training providers and disabled people to focus our energies more directly on those learners who have additional support needs.

Our commitment to equality is enshrined in our core values – quality, integrity, innovation, partnership and service. But we do recognise that equality needs to be made explicit in all aspects of our work.

We have involved disabled people in the development of this Disability Equality Scheme, and we are very grateful to everyone who gave up their time to participate in the discussions. Areas for improvement were highlighted, and this enabled us to prioritise a number of key actions.

We welcome our Disability Equality Duty, and the opportunity to make improvements, where needed, in the level of service we offer to all candidates, their parents, staff, centres and stakeholders.

Tom Drake

1 What we do

Our qualifications are offered at approximately 1,470 centres, including schools, colleges, employers and private training providers in Scotland and elsewhere. In 2005 we received more than 2.5 million entries, from around 500,000 candidates.

SQA's purpose is to:

- ◆ Devise, develop and validate qualifications and keep them under review.
- ◆ Approve and accredit qualifications.
- ◆ Approve and quality assure education and training establishments that offer SQA qualifications.
- ◆ Arrange for, assist in, and carry out the assessment of candidates taking SQA qualifications.
- ◆ Award and issue certificates to candidates.
- ◆ Ensure that Scottish qualifications contribute to economic growth, social justice and lifelong learning.

Our mission:

SQA will work in partnership to provide high quality, recognised and relevant qualifications and assessment.

Our vision:

To be recognised nationally and internationally as a leader in learning and assessment.

We are responsible for a large range of academic and vocational qualifications. These are split into three main types:

- ◆ Units (National, Higher National and SVQ)
- ◆ Courses (Standard Grades and National Courses)
- ◆ Group Awards (National Progression Awards, National Certificates, HNCs and HNDs, SVQs, Professional Development Awards (PDAs) and Customised Awards)

2 The law

The Disability Discrimination Act 1995 brought in measures to prevent discrimination against disabled people. Part 2 of the Act says that disabled people should not be discriminated against when seeking employment. Part 4 of the Act (as amended by the Special Education Needs and Disability Act 2002 and the Disability Discrimination Act 2005) says that disabled people should not be discriminated against in accessing education or during the course of their education in schools, colleges and universities.

The Disability Discrimination Act 2005 introduced a new disability equality duty for the public sector, from December 2006, to promote disability equality across all functions. This means that we need to ensure that we continue to build equality into everything that we do. The general duty requires that every public body needs to have due regard to the need to:

- ◆ promote equal opportunities
- ◆ eliminate unlawful discrimination
- ◆ eliminate disability related harassment
- ◆ promote positive attitudes towards disabled persons
- ◆ encourage participation by disabled persons in public life, and
- ◆ take steps to take account of disabled people's disabilities, even where that involves treating disabled persons more favourably than other people

Under the specific duties, we are required to publish a Disability Equality Scheme by 4 December 2006. The Disability Equality Scheme must include an Action Plan which sets out the steps that we will take to meet our general duties.

In addition, new provisions under Part 4 of the Disability Discrimination Act 1995, have extended the existing Code of Practice for Trade Organisations and Qualifications Bodies to include General Qualifications Bodies.

We are also required, from 1 September 2007, to ensure that no disabled person is discriminated against in relation to conferring qualifications by:

- ◆ direct discrimination — treating a disabled person less favourably on the grounds of their disability

- ◆ failing to make reasonable adjustments
- ◆ disability-related discrimination — treating a disabled person less favourably without justification for a reason relating to their disability
- ◆ victimisation — subjecting a disabled person to disability-related harassment

The new draft Code of Practice for General Qualifications Bodies makes a number of recommendations that we need to consider to ensure that effective policies and procedures are in place to minimise the risk of discrimination. These include:

- ◆ anti-discriminatory policies
- ◆ disability awareness and equality training
- ◆ communication of relevant policies to candidates
- ◆ communication of policies and consequences for breaching anti-discriminatory policies
- ◆ monitoring implementation and effectiveness of such policies
- ◆ addressing disability discrimination by employees as part of disciplinary rules and procedures
- ◆ providing accessible complaints procedure and quick resolution
- ◆ regularly reviewing effectiveness of reasonable adjustments
- ◆ maintaining records of decisions taken
- ◆ regularly reviewing competence standards
- ◆ ensuring system for reasonable adjustments is effective
- ◆ ensuring our appeals procedure is effective

We already comply with most of these recommendations but, where necessary, we have set out actions we need to take in our action plan.

3 Our principles

This Disability Equality Scheme sets out the framework within which we intend to promote equality. Our commitment to delivering our Disability Equality Scheme is based on the following principles:

- ◆ To 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 must 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 support needs so long as they are consistent with national standards.
- ◆ To do more than simply comply with our duties under legislation in areas such as discrimination and support for learning.
- ◆ To embed equality in all our activities.
- ◆ To make our website and publications accessible to all users.
- ◆ To create a culture where everyone is treated on an equal basis.
- ◆ Discrimination – direct or indirect – is unjust and will not be tolerated.
- ◆ To ensure that our suppliers and partners comply with the requirements of the DDA.

4 Developing our Disability Equality Scheme

4.1 Planning

SQA set up a project team to plan and develop the Disability Equality Scheme and Action Plan. The remit of the project team included reviewing the consultation documents on the extension of the DDA to General Qualifications Bodies, undertaking external and internal consultation events, gathering evidence and identifying gaps in our data, arranging training for all staff and drafting an overarching equality policy.

4.2 Involvement

We are committed to working in partnership with the disabled and Deaf community to develop, implement and review our Disability Equality Scheme. We invited members of disabled groups — two of them disability led — to attend focus groups at events held in Edinburgh and Glasgow.

Our delegates included individuals from disabled and Deaf organisations as well as individuals who have a disability or a hearing impairment. Our programme for each event focused on qualifications and employment. We asked delegates to let us know what we do well, what needed to be improved, and what barriers individuals faced when applying for jobs and in carrying out a job.

We recognise that some disabled staff are reluctant to disclose a disability. For this reason we issued an anonymous questionnaire to all staff and invited staff to an open meeting to discuss their issues face-to-face.

The feedback from the events was extensive and informative, and this information has helped us to identify and prioritise the actions needed to work towards equality of access to our qualifications and employment with SQA.

We recognise that we need to do more to engage with disabled people directly — especially our candidates — and we are considering the methods that we could use to reach as many disabled people as possible.

4.3 Feedback from focus groups

A range of people attended our focus groups — disabled, deaf or hearing impaired, parents, teachers and lecturers involved with disabled candidates, disability consultants, disability professionals, and relatives of people affected by disability. From the workshops it was clear that SQA is delivering well in many areas, but that we need to do more.

For qualifications, we need to improve accessibility to our qualifications, improve our channels of communication, provide disability awareness training for staff and groups working with SQA, involve disabled people in the development of our services, and make clear the separation of responsibilities between SQA and centres.

For employment, we need to revise our application and interview procedures to make them more accessible, improve internal communication, and raise awareness of disability issues through education and training.

4.4 Gathering and using evidence

SQA has 23 business areas headed up by Business Managers. All business managers were asked to provide qualitative and quantitative information that we hold on disabled people, and to indicate the gaps in our knowledge.

- ◆ **Qualitative:** we have a number of formal and informal networks with disability organisations and disability professionals who work with us to improve accessibility to our qualifications and assessment. We also receive feedback from our centres, and review data collected on candidates who request adjustments to assessment arrangements.
- ◆ **Quantitative:** we currently collect and analyse candidate attainment data on age and gender only. Because data collection can be expensive and time consuming for both ourselves and our centres, we are investigating two options for collecting disability data. These are to collect data within our current procedures, or to share data already collected from other sources. We are currently exploring data-sharing through the Steering Group on the Data Exchange in Education and Children's Services (DEECS). We are a member of this group along with representatives of the Scottish Executive, Scottish Higher Education Funding Council and Scottish Enterprise.

Once we are in a position to collect data on declared disabilities we will be able to highlight possible inequalities, research their underlying causes and remove any discriminatory practices where they exist. This information will also be useful in the preparation of subsequent Disability Equality Schemes.

4.5 Developing our Action Plan

Our Action Plan developed from:

- ◆ Feedback from the focus groups (see 4.2).
- ◆ Recommended steps set out in the draft consultation on the Code of Practice for Trade Organisations, Qualifications Bodies and General Qualifications Bodies.
- ◆ Known issues or gaps relating to disability equality that were identified when gathering information on our policies and functions.

We have set out actions (where they're required) against each of the general duties.

5 Where are we now – a summary

5.1 Qualifications

Design

Issues around the design of qualifications are clearly our responsibility.

Learners with disabilities may encounter real or perceived barriers in the way that qualifications are designed. Some barriers relate to genuine and valid competence standards and are not removable. Others may be based on long held traditional views of what a 'typical' learner profile for a qualification is and which could be removed.

We are working hard to remove barriers at the design stage of qualifications through training and improved guidance materials. We are committed to developing accessible qualifications, based on national standards, that are accessible to learners who have the potential to achieve them.

Currently we do this by providing written guidance on accessibility for people who write and/or edit qualifications and who have a clear understanding of the nature of unit specifications.

Courses at Access level

Access Courses are groups of three related Access Units which together form a coherent package. They differ from National Courses in that they have no external assessment. They are available at levels 2 and 3, with Access 3 being benchmarked on Standard Grade, Foundation Level. Table 1 provides information on entries and awards:

Table 1

Unit / Course level	2004 Entries	2004 Awards	2005 Entries	2005 Awards	2006 Entries	2006 Awards
Access 1 Units	6,211	4,997	6,785	5,583	7,198	5,239
Access 2 Courses	2,344	1,617	2,138	1,622	2,162	1,427
Access 3 Courses	12,759	9,207	15,820	11,945	19,352	15,172

In 2003 SQA introduced a new range of qualifications called Access 1 Supported Level. These new Supported Level Units are designed specifically for learners with complex needs and learners who may always need a degree of adult support. These qualifications allow for this group of learners to be certificated within the national system of qualifications. Since 2003 interest in these qualifications has grown and we are looking to develop more qualifications at this level.

British Sign Language (BSL) courses

Around 750,000 Scots have some form of hearing loss and around 50,000 have severe or profound deafness. An estimated 70,000 people in the United Kingdom use British Sign Language (BSL) as a first language — 6,000 of these live in Scotland.

As a linguistic minority, native speakers of BSL have little access to the majority, English-speaking culture.

We make provision for candidates to access their assessments in National Qualifications using BSL. We intend to work with the Sector Skills Council to review the National Occupational Standards that underpin Higher National and Scottish Vocational Qualifications to ensure that there are no unnecessary barriers that prevent candidates who use BSL from achieving qualifications.

With support and advice from the Scottish Executive’s British Sign Language and Linguistic Access Working Group, we have begun the process of revising our British Sign Language (BSL) qualifications — by rewriting the existing Professional Development Award in the first instance.

We intend to review and develop our qualifications in BSL, but it’s a large-scale task, so we need to take a staged approach. Also, we face a significant challenge to address

regional language differences and technical jargon that can be barriers to effective communication with BSL speakers.

5.2 Assessment

Design

As the national awarding body for Scotland, SQA has a responsibility to ensure that the process of assessment leading to certification is rigorous and fair and allows all candidates to demonstrate the skills and knowledge required for the award. In our external examinations we do this by ensuring that our question papers are designed to be as accessible as possible. We do this by:

- ◆ Providing written guidance to Principal Assessors that sets out their role and responsibilities in setting and quality assuring paper based questions (which includes issues around accessibility).
- ◆ Providing written guidance to Vettors to help them assess the validity, reliability and accessibility of examination papers.
- ◆ Providing equality training to staff in qualifications and assessment teams on setting accessible and valid question papers.

Providing assessment arrangements for disabled candidates

We have four principles that underpin our policy on assessment arrangements for candidates with disabilities and/or additional support needs. These are that:

- ◆ candidates should be potentially able to achieve the national standards
- ◆ any adjustment to the published assessment arrangement should not compensate for a candidate's inability to meet set standards
- ◆ adjustments should be tailored to meet the individual needs of candidates
- ◆ any adjustment should reflect, as far as possible, a candidate's normal way of learning and producing work

These principles are intended to ensure consistent interpretation and application of the policy across all centres, and to ensure that no candidate is disadvantaged.

We also provide written guidance to centres on:

- ◆ the range of assessment arrangements for candidates with disabilities and/or additional support needs (this document will be updated in 2007)
- ◆ requesting assessment arrangements — this year we launched new software to make the process of submitting assessment arrangement requests for externally-assessed National Qualifications as simple as possible
- ◆ the evidence needed to support a request for an assessment arrangement

The total number of Assessment Arrangement (AA) requests for diet 2006 was 43,291, submitted on behalf of 10,650 candidates. This represents an increase in number of requests of 4.4% on 2005.

Number of candidates and requests for AA, 2004 – 2006

Year	Number of candidates requesting AA	Number of AA requests
2004**	9,904	45,680
2005**	9,814	41,454
2006	10,650	43,291

AA requests by level, 2004 – 2006

Requests as % of all Assessment Arrangement requests

Level	2004**	2005**	2006
Standard Grade	60.1%	57.9%	56.6%
Intermediate 1	7.3%	8.2%	9.2%
Intermediate 2	13.0%	13.1%	13.4%
Higher	18.0%	19.0%	19.0%
Advanced Higher	1.6%	1.8%	1.8%

** Figures based on requests rather than uptake

Adapted formats including digital format

Each year our staff in Assessment Materials work closely with experienced professionals in the field of visual impairment to gather feedback on adapted format examination materials. The feedback is important to us and suggestions for improvement are taken on board each year to ensure the examination materials are appropriately adapted to meet the needs of those who will use them.

In 2006 we provided 5,369 adapted format question papers in the following range of formats, an increase of 107 for 2005.

White paper	1,662
Large print	1,071
Colour copies	938
N14-18 font	562
Reader copy	408
N20-28 font	259
Adapted content	139
N36-48 font	104
Digital question papers	146
Braille	80

During the 2006 examination diet of examinations, our Assessment Materials team worked with the University of Edinburgh to run a pilot on digital question papers. Candidates with reading and/or writing difficulties used speech technology to complete their examinations on screen. The pilot involved eight centres, 100 question papers and 32 candidates. The pilot was very successful and we are looking to offer selected digital questions papers as a standard adaptation for the 2008 diet.

In the area of National Qualifications we are revising the font used for standard templates to Arial 12 for all new National Assessment Bank packs and for those where any revision is taking place.

E-Assessment

SQA has a business area dedicated to computer assisted assessment (CAA). The CAA team is responsible for developing on-line assessment materials. This work will benefit all our candidates, but there are likely to be greater benefits for candidates with disabilities or additional support needs.

The CAA team have also been researching ways that ICT can help improve the accessibility of our assessments through a number of projects, including:

Pass-IT

This project researched how on-screen assessments could be made more accessible. This included use of e-assessments by disabled people. It was independently evaluated by the BRITE (Beattie Resources for Inclusiveness

in Technology and Education) initiative and commended for the way it addressed accessibility issues.

Avatar signing

SQA has recently been awarded funding for a research project to pilot the use of avatars to sign assessments for our PC Passport qualification in British Sign Language. This involves us in work with the University of East Anglia and the Royal National Institute for Deaf People. It is the first time that avatars have been used to support a qualification.

Technology from the University of East Anglia enables a virtual human character to perform BSL signs coded in a signing gesture notation. A team of deaf people from the Royal National Institute for Deaf People has notated a lexicon of signs enabling a range of BSL phrases to be animated.

A number of questions from the PC Passport IT qualification are being translated into BSL. A glossary of computing terms used in PC Passport is being created explaining each term in BSL. Deaf candidates will take the tests both with and without BSL support, and the results will be analysed carefully to identify the most effective techniques for providing support for deaf candidates.

Developing guidance for staff

The CAA team has created a training package for staff relating to accessibility issues in the use of ICT to support our qualifications.

Delivering training using the web rather than paper

We have a growing strand of work that uses the internet rather than paper as the main means of delivering training, for example through the Understanding Standards Website. This provides for enhanced accessibility features, such as use of screen readers.

We are continuing to review the way we present information to ensure that it is as accessible as possible, for example moving away from pdfs.

Results Online

The Data Management business area have developed an online facility for candidates to access their records. The next release of results online will provide access to disabled candidates.

5.3 Certification

SQA provides certificates in enlarged format and Braille.

5.4 Appointees and Invigilators

Our Assessment Logistics business area recruits some 17,000 Appointees and Invigilators each year to carry out approximately 20,000 assessment duties — for example, examiner, setting, vetting, verification and invigilation. Recruiting Appointees can be difficult as they must be suitably qualified and motivated to do the duties.

As part of our quality assurance role, we oversee the deployment of a large pool of Appointees who visit colleges and other SQA centres regularly, to carry out visiting examination and/or verification duties. Disability awareness is included in the training provided, and Appointees are asked to comment on 'fair access' to qualifications as part of their feedback reports. Comments cover issues such as font size, availability of adapted formats, and assessment arrangements.

5.5 Publications

Our publishing team produce over 700 publications per year for a variety of audiences. This includes:

- ◆ procedural documents for National Qualifications examinations
- ◆ procedural documents for heads of centres, SQA co-ordinators, subject teachers/lecturers and specialists
- ◆ promotional documents for National Qualifications examinations for centres, parents and candidates
- ◆ qualification-specific promotional documents for the general public
- ◆ promotional documents on SQA and its services for the general public
- ◆ packs for teachers/lecturers and others attending events for qualification launches or professional development
- ◆ learning and teaching packs for teachers/lecturers and students in centres
- ◆ HN assessment exemplars for further education lecturers and students

- ◆ SVQ assessor's guidelines
- ◆ SVQ portfolios for colleges, employers, external training providers and candidates
- ◆ reports, questionnaires and case studies for the general public
- ◆ internal documents for SQA staff

Many of our documents are produced in text only and are easy to produce in any format on request. Some of our documents are text based but have not been set up to be accessible so require modification.

A significant number of our publications contain text, tables, diagrams and some images that are integral to the content. These publications are often complex with technical content and, while it is possible to adapt these publications on request, their content and complexity may demand significant modification. In addition any qualification which has been modified has to be re-vetted on its technical content, and this can cause real difficulties and delays for vetting teams. The publishing team are currently looking at a solution to this problem.

Some of our publications are largely laid out in tables and are based on National Occupational Standards developed by the Sector Skills Council. We can't make any alterations to the written content of these documents.

5.6 Website

There are over 7,000 pages on our website. Our website contains more than 45,000 documents in different formats — Word documents, PDF, PowerPoint and Excel Files — and are accessed by a variety of audiences.

All pages added after October 2004 meet minimum DDA compliance standards, but older pages need checking and updating to ensure compliance.

Our website achieved 'AA' level WAI (Web Accessibility Initiative) rating in 2004, but regrettably this level has not been maintained, due mainly to the size and complexity of the website. We recognise that our website needs substantial improvement, and we have started work on a web strategy. All new pages added to the site meet Level A accessibility standards.

5.7 Employment

The 'Social Model of Disability', which was created by disabled people, describes 'disability' as an issue that means people face daily barriers within society. It identifies the barriers, behaviours and attitudes that cause problems for disabled people, and empowers disabled people to overcome these barriers.

We recognise that we must review our employment procedures and training to ensure that the barriers being faced by disabled people are adequately addressed.

We collect information on disability via an Equal Opportunities Monitoring Form. This form is anonymous as people are often reluctant to tell their employers if they have a disability.

Recruitment

- ◆ The recruitment and selection process covers all recruitment into and within SQA, including promotion opportunities.
- ◆ All adverts state that SQA welcomes applications from all sections of the community.
- ◆ Special arrangements will be made, if requested, for any individual attending interview.
- ◆ Recruitment and selection training is provided to all managers and provides information about what it means to be an equal opportunities employer, describes discrimination legislation and provides managers with knowledge and understanding of the appropriate behaviours and attitude expected at interviews.

Training and development

- ◆ Training is requested through the Performance Management process (through the completion of the performance development plan).
- ◆ Training requested should equip the employee, where required, with the skills and knowledge to undertake their role.
- ◆ The Learning and Development policy provides criteria upon which certain further education may be requested, which is equal to all employees within SQA.

Performance management

- ◆ The same process, as described by the Performance Management Handbook, applies to all employees.

- ◆ Is a process by which manager and employee set objectives, in line with operational plan requirements, and review over the course of the performance year.
- ◆ Performance Management training is available for both reviewees and reviewers and describes a best practice approach to conducting the process.

Line management responsibilities

SQA has a responsibility under the Disability Discrimination Act to minimise the risk of discrimination, both direct and indirect, to disabled employees. We have a number of policies that aim to ensure we comply with this responsibility, including:

- ◆ SQA code of conduct, describing the behaviours and conduct that are expected from all employees.
- ◆ Anti-bullying and harassment policy.
- ◆ Dispute Resolution policy, comprising both Disciplinary and Grievance procedures.

Reasonable adjustments

If, at any time, a disabled member of staff requires a reasonable adjustment to be made, he or she can speak to our Occupational Health Adviser to discuss their individual needs. Examples of reasonable adjustments include chairs designed for back problems, disabled car space and voice activated software.

Service delivery improvements

We will be reviewing our documents, policies and functions in order to identify where we can make improvements in our service delivery. We will also review our training programme to ensure that we promote awareness of disability and equality in employment.

5.8 Accreditation

We are responsible for approving awarding bodies to ensure that they have in place the necessary policies, systems and procedures to award SVQs. We also audit awarding bodies to confirm that they continue to meet our requirements.

The criteria that we use to assess centres are being revised to reflect requirements of the DDA.

5.9 Partnership working

We work in partnership with other UK awarding bodies to develop and carry out good practice in relation to our duties to disabled learners in Scotland. DELLS (Department for Education, Life-long Learning and Skills) led a UK-wide Advisory Group that seeks to promote and improve access to qualifications and assessment. This group's membership included representatives from the Joint Council for Qualifications, the Federation of Awarding Bodies, the Disability Rights Commission and government departments.

We also work in partnership with national and international organisations. Where partnerships with other organisations are doing things that impact on disability equality, we are committed to making clear our requirements for promoting disability equality. Our partners overseas will be bound by the laws that apply in their own country, but we will include in our quality assurance procedures that partners must not breach anti-discriminatory legislation.

In June 2006 we ran a series of national seminars for people involved in delivering assessment arrangements for candidates with disabilities and/or additional support needs. The aim of these seminars was to provide practitioners with the opportunity to network, discuss issues and share good practice. The feedback from the seminars was very positive and they will run again in 2008.

5.10 Procurement

Where procurement impacts on disability equality, we are committed to making clear our requirements for the promotion of disability equality. Our procurement procedures are being revised to take account of this.

Where we have specific equality requirements, we will incorporate them into individual tenders and contracts.

5.11 Accessible buildings and services

We recognise our responsibility to provide accessible buildings and facilities, and to provide a safe and healthy working environment for staff and visitors. We have set out our responsibilities in our Health & Safety Policy.

5.12 Research and Information Services

We have a business area dedicated to research and information services. We do not currently collect data on disabled candidates taking SQA qualifications, but data is collected on candidates who request adjustments to assessment arrangements.

The data is analysed by the RIS team and helps — along with feedback from centres, disability groups and professionals who work with us — to inform changes in qualification design and assessment.

6 Taking the Scheme forward

6.1 Accountability

As accountable officer of SQA, the Chief Executive has overall responsibility for the implementation of the Disability Equality Scheme. SQA has four directorates and two business areas which report directly to the Chief Executive. Each Director has responsibility for the implementation, monitoring and reporting of the planned actions under their leadership.

6.2 Publication of the Disability Equality Scheme

SQA's Disability Equality Scheme will be published on our website in its entirety, and will be made available in different formats on request.

6.3 Communication

We will communicate the existence of our Disability Equality Scheme internally and externally to ensure that our staff, stakeholders and candidates are aware of our commitment to the Disability Equality Duty.

We have a number of methods of communicating with centres and stakeholders.

Each centre has an SQA Co-ordinator who is the first point of contact between SQA and centres. SQA Co-ordinators are responsible for communicating key messages, changes in policy and procedure, and for reporting feedback to our Customer Support Managers.

Our Customer Support Managers work closely with centres to address any issues brought to their attention.

We issue a monthly e-zine to SQA co-ordinators and other stakeholders to update them on current developments.

Our website is maintained by our web team to ensure that publications, guides and information are current. We are developing a web page for equality and diversity, and will use the website to communicate information about equality.

Our internal communications include business team meetings, regular all-staff briefings by the Chief Executive, and a bulletin board and fortnightly newsletter which are easily accessible on our intranet. We evaluate the effectiveness of our communications annually through stakeholder and staff surveys. We have set up a working group to review why and how we engage with stakeholders and candidates so that we can co-ordinate and strengthen our work in this area.

Our Customer Contact Centre handles all telephone calls to our main number. All staff in the Customer Contact Centre are familiar with the typetalk facility which enables communication between deaf, deafblind, deafened, hard of hearing and speech-impaired callers and hearing call takers.

6.4 Impact Assessment

Training

SQA has engaged an experienced diversity trainer with lengthy experience in impact assessment. We will be using the trainer's own equality and diversity toolkit, which we can tailor if required.

Members of staff across all business areas have been identified to attend a training course on impact assessment. The training will take place from January to March 2007.

Screening and timetabling

Each business area will screen all functions and policies for relevance and develop a timetable for impact assessments.

Impact Assessment Reports and Equality Action Plans

Each business area will conduct impact assessments in accordance with the timetable that has been set. All business areas will be required to prepare an impact assessment report which clearly sets out suggested improvements, actions and outcomes.

The availability of impact assessment reports will be communicated internally and externally, and will be incorporated into equality action plans. Equality action plans will be incorporated into our performance management processes.

6.5 Over-arching equality policy

We are developing an over-arching equality policy which sets out our legal responsibilities and explains how impact assessment will be incorporated into our decision-making process. The policy will also set out our requirements for costing the proposed improvements and actions, any necessary approval processes and performance management requirements.

6.6 Continuing involvement of disabled people

We asked disabled people who were invited or attended a focus group if they would like to continue working with us to develop our response to the Disability Equality Duty. A number of disabled people, parents of disabled children and candidates and other people with a specific interest or knowledge of a disability expressed interest.

We are seeking more volunteers to ensure that all disabled groups are represented. We will publish details about disabled people's on-going involvement on our website once our new web page on equality and diversity has been set up.

By having a large pool of disabled people to contact we hope to avoid involvement fatigue, make sure that the same views are not recycled, and involve disabled people in areas in which they have a particular interest.

6.7 Reviewing the Disability Equality Scheme

We will review the scheme's progress annually to review existing actions and update action plans based on newly identified priority areas. Annual reports and updated action plans will be subject to approval by the Executive Management Team and will be communicated internally and externally.

We will produce a revised Disability Equality Scheme every three years.

6.8 Training

Training on the equality issues to consider in the design of national qualifications started in November 2006 for Qualifications staff in National Qualifications business areas. A large scale training programme starts in January 2007 as follows:

- ◆ Executive Team/Business Managers — full day event in January
- ◆ Impact Assessment Training — late January to end of March
- ◆ General Awareness Training with emphasis on disability — late January to end of March

We are developing an on-going training programme related to disability and equality which will include disability specific training for front-line staff, tailored training for targeted staff and other groups, and any training that is identified as necessary during impact assessments.

6.9 Monitoring the Scheme and Action Plans

Monitoring of the Disability Equality Scheme and Action Plans will happen as part of our normal reporting procedures. We report on corporate performance and progress against plans and budgets monthly, quarterly and annually.

We produce and publish annual accounts and an annual report each year. This contains key financial and performance information, and updates and monitors the progress we are making in achieving our corporate aims.

Quarterly, we review progress against business plan objectives and then re-forecast our planned income and expenditure in line with planned activity.

Monthly, key performance information is supplied to the business to assist management focus, encourage challenge, inform activity to influence or improve performance, and give assurance of progress. Our Monthly Management Team meeting is one of the forums we use to review performance information at corporate and business area level.

We have recently developed a corporate Balanced Scorecard to support the execution of our 2006–07 Business

Plan. The Balanced Scorecard includes outcomes, measures and targets against our corporate objectives.

Each business area will be responsible for developing individual equality action plans. These will eventually be incorporated into operational, business and corporate plans to enable progress to be monitored effectively.

7 Looking ahead

7.1 Developments

Resourcing

- ◆ We are appointing a Development Officer to develop a Professional Development Award in Tutoring British Sign Language.
- ◆ We are recruiting an Equalities Officer to be in post from April 2007. The Equalities Officer will have a wide ranging remit which will include working with business areas to develop equality actions plan following impact assessments, monitoring, reviewing and reporting on action plans, preparing an annual report, identifying and arranging delivery of training on equality and diversity issues, providing advice to staff on equality issues and developing our next Disability Equality Scheme.

7.2 Challenges

Accessible qualifications

We will be challenged to establish a robust process for reviewing qualifications to ensure that the competence standards described in Course Arrangements and Unit Specifications are not discriminatory. This will hopefully enable more disabled people to access and gain our Qualifications.

Resources

Like other public bodies, our resources are always stretched to capacity. The resources required to carry out the actions set out in the DES action plan, and the actions and improvements arising from impact assessment, are yet to be made clear. By developing equality action plans for each business area we can ensure that planned actions are properly costed, proportionate and approved before implementation.

Culture change

Change is a challenge for any organisation, but particularly when it is related to legislation. We hope to bring about a positive culture change through training, mainstreaming and

communication of areas where change has resulted in positive outcomes for disabled people.

Plain English

We try to make our publications as easy and straightforward to understand as we can and try to avoid all unnecessary jargon. This is a challenge to us because of the number of publications we produce each year, but we will try to address this issue, where we can, through a widespread training programme and communication of the availability of guidance materials.

We employ a full-time editor whose main function is to ensure that (a good proportion of) our output is in Plain English.

8 Contacting SQA

Developing our Disability Equality Scheme is an on-going process and we recognise that we will not get everything right first time. We welcome feedback on the Scheme and the Action Plan and would be happy to receive your thoughts and concerns. Or, if you would like to be involved in developing our response to the Disability Equality Duty, please let us know.

You can contact us by:

e-mail **ded@sqa.org.uk**

telephone 0131 271 6719

writing Legal & Administrative Services
 Scottish Qualifications Authority
 Ironmills Road
 Dalkeith
 EH22 1LE

**Scottish Qualifications Authority
Action Plan for 2007 – 2009**

Action Plan for Chief Executive Department

**Promote equality of opportunity between disabled persons and other persons
Eliminate discrimination that is unlawful under the Act**

No.	Actions	Owner	Timescale	Outcome
1.	To inform staff at all staff briefing on 4 December 2006 of the Disability Equality Duty and our responsibilities under the DDA 2005.	Tom Drake, Interim Chief Executive	4 December 2006	Emphasise importance of the DED to all staff and explain SQA's role in promoting equality of opportunity and eliminating discrimination.
2.	Screen all policies and functions for relevance and prepare schedule of impact assessments.	Neil MacGowan	Screening to be completed by 31.5.07 All impact assessments to be completed by 31.10.09	All disability relevant policies impact assessed. Improvements and outcomes set out in reports to be published on website.

3.	Develop and implement communication plans.	Neil MacGowan	By 30.6.07	Improve internal and external communications, and in particular how information is communicated to centres, learners, candidates and parents of candidates.
4.	<p>Develop equality action plan in each business area arising from the improvements and outcomes identified following impact assessment.</p> <p>Set out resource implications of identified improvements and actions for approval. Incorporate approved actions into operational plans.</p> <p>Incorporate approved actions into operational plans.</p>	Neil MacGowan	From start of IA process – ongoing.	<p>All actions are captured in our performance reporting processes and fully costed before implementation.</p> <p>All planned actions and timescales will be transparent.</p>
5.	Review complaints procedure to ensure that it is accessible	Neil MacGowan	By 31.12.07	Complaints procedure accessible to all disabled people.

**Scottish Qualifications Authority
Action Plan for 2007 – 2009**

Action Plan for Qualifications Directorate
Responsibility for Implementation – John Young

**Promote equality of opportunity between disabled persons and other persons
Eliminate discrimination that is unlawful under the Act**

No.	Actions	Owner	Timescale	Outcome
1.	Screen all policies and functions for relevance and prepare schedule of impact assessments in each business area.	Roderic Gillespie Robert Quinn Lesley Joyce Carolyn Davidson Martyn Ware Lena Gray Gordon Rodgers Joe Wilson Anne Mearns Moira McKerracher Alastair MacGregor Martin Chisholm John Dick	Screening to be completed by 31.5.07 All impact assessments to be completed by 31.10.09	All disability relevant policies and functions impact assessed. Improvements and outcomes set out in reports to be published on website.

2.	When developing new and reviewing existing qualifications ensure that there are no unintended barriers in place.	Roderic Gillespie Robert Quinn Lesley Joyce Gordon Rodgers Joe Wilson Anne Mearns	Rolling programme as part of development strategy	To remove any barriers not related to competence standards to ensure qualifications are accessible to all learners who have the potential to achieve them.
3.	<p>Develop equality action plan in each business area arising from the improvements and outcomes identified following impact assessment.</p> <p>Set out resource implications of identified improvements and actions for approval. Incorporate approved actions into operational plans.</p> <p>Incorporate approved actions into operational plans.</p>	Roderic Gillespie Robert Quinn Lesley Joyce Carolyn Davidson Martyn Ware Lena Gray Gordon Rodgers Joe Wilson Anne Mearns Moira McKerracher Alastair MacGregor Martin Chisholm John Dick	From start of IA process – ongoing.	<p>All actions are captured in our performance reporting processes and fully costed before implementation.</p> <p>All planned actions and timescales will be transparent.</p>
4.	Investigate and report on a disability symbol system for qualifications.	John Young	By 30.09.07	If adopted, indicate to learners which qualifications have been disability proofed and are accessible in formats like BSL.

5.	Involve disabled people in the strategy plans and approach for e-activity.	Martyn Ware	From 05.12.06	Comply with legislation and help the CAA team understand fully the barriers faced by disabled people in accessing e-assessments.
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Eliminate harassment of disabled persons that is related to their disabilities

Promote positive attitudes towards disabled persons

6.	Ensure that all staff participate in an equality and diversity training event and other equality related events planned.	All Business Managers	From January 2007 onwards	To understand the legal definition and issues of disability, SQA's policy on harassment and to promote positive attitude towards disabled people.
7.	Ensure that communication of equality policies to candidates is considered and included in communications strategy.	John Young	By 30.6.07	Candidates aware of our policies on disability.

Take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons

8.	Review the effectiveness of reasonable adjustments made for disabled people and act on the findings of review.	Patricia McDonald	By 31.12.07	Effective and robust procedures in place for reasonable adjustments.
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9.	Develop and publish a guide for parents on assessment arrangements.	Patricia McDonald	By 31.12.07	Information source for parents setting out responsibilities of SQA and centres.
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**Scottish Qualifications Authority
Action Plan for 2007 – 2009**

Action Plan for Finance & Corporate Performance Directorate
Responsible for Implementation – Ron Sylvester, Director

Promote equality of opportunity between disabled persons and other persons

No.	Actions	Owner	Timescale	Outcome
1.	Screen all policies and functions for relevance and prepare schedule of impact assessments in each business area.	Vivienne Muir Jean Blair Karen Dinwoodie	Screening to be completed by 31.3.07 Impact assessments to be completed by 31.10.09	All disability relevant policies and functions impact assessed. Improvements and outcomes set out in reports to be published on website.
2.	Revise procurement procedures and update tender and contract templates.	Vivienne Muir	By 31.01.07	Ensure that, for all new contracts, all SQA's service providers are fully aware of and comply with the requirements of the DDA.

3.	Develop a web page on equality and diversity on SQA's website and develop internal L&AS portal for staff	Vivienne Muir	By 28.02.07	To raise the profile of disability externally and internally
4.	<p>Develop equality action plan in each business area arising from the improvements and outcomes identified following impact assessment.</p> <p>Set out resource implications of identified improvements and actions for approval. Incorporate approved actions into operational plans.</p> <p>Incorporate approved actions into operational plans.</p>	Vivienne Muir Jean Blair Karen Dinwoodie	From start of IA process – ongoing.	<p>All actions are captured in our performance reporting processes and fully costed before implementation.</p> <p>All planned actions and timescales will be transparent.</p>
5.	Explore and report on options for data collection/data sharing.	Vivienne Muir	By 31.3.07	Data collection method to be robust and cost effective.

Eliminate harassment of disabled persons that is related to their disabilities**Promote positive attitudes towards disabled persons**

6.	Implement a comprehensive disability and equality training programme for staff and other groups working with SQA.	Vivienne Muir	November 2006 – ongoing	To ensure that all staff and other groups understand the issues around disability and to put these issues into context in the work that they carry out for SQA.
7.	Ensure that all staff participate in an equality and diversity training event and other equality related events planned.	All Business Managers	From January 2007 onwards	To understand the legal definition and issues of disability, to understand SQA's policy on harassment and to promote positive attitude towards disabled people.

Encourage participation by disabled persons in public life

8.	Review with the Scottish Executive the membership of SE appointed committee members.	Vivienne Muir	By 30.06.07	To ensure that our committees are fully representative.
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**Scottish Qualifications Authority
Action Plan for 2007 – 2009**

Action Plan for Operations Directorate
Responsible for Implementation – Karen McCallum, Director

**Promote equality of opportunity between disabled persons and other persons
Eliminate discrimination that is unlawful under the Act**

No.	Actions	Owner	Timescale	Outcome
1.	Screen all policies and functions for relevance and prepare schedule of impact assessments in each business area.	Helen Probart Rhona Wright David Falconer Jacqui Faulds Bill Alexander	Screening to be completed by 31.3.07 Impact assessments to be completed by 31.10.09	All disability relevant policies and functions impact assessed. Improvements and outcomes set out in reports to be published on website.

2.	<p>Develop equality action plan in each business area arising from the improvements and outcomes identified following impact assessment.</p> <p>Set out resource implications of identified improvements and actions for approval. Incorporate approved actions into operational plans.</p> <p>Incorporate approved actions into operational plans.</p>	<p>Helen Probart Rhona Wright David Falconer Jacqui Faulds Bill Alexander</p>	<p>From start of IA process – ongoing.</p>	<p>All actions are captured in our performance reporting processes and fully costed before implementation.</p> <p>All planned actions and timescales will be transparent.</p>
3.	<p>Revise the house style of SQA publications to address disability related issues.</p>	<p>Helen Probart</p>	<p>By 30.6.07</p>	<p>To substantially improve accessibility to publications.</p>
4.	<p>Communicate guidance on house style to all staff.</p>	<p>Helen Probart</p>	<p>As soon as available.</p>	<p>Improved accessibility and reduction in time spent by publishing staff on revising documents for publication and/or adapted formats.</p>

5.	Review format of NQ question papers for centres and specimen question papers for new/revised courses.	Helen Probart	By 30.6.07	Increased accessibility to question papers and reduction in number of requests for adapted formats.
6.	Review document set up and use of software for publications for print or website.	Helen Probart	By 31.12.07	To enable easier adaptation.
7.	Publish (on website) and communicate policy on adapted formats.	Helen Probart	By 31.8.07	SQA's policy on adapted formats to be accessible to everyone.
8.	Develop publishing portal and communicate availability of the range of adapted formats available to SQA staff who deal with requests from centres and customers.	Helen Probart	By 31.3.07	All SQA staff to be aware of the range of adapted formats that can be provided to centres and customers.
9.	Roll out Effective Writing Workshops more widely and incorporate disability issues into training.	Helen Probart	From 1.1.07	SQA staff to understand need to use plain English in documents and prepare documents in line with revised guidance on house style.

10.	Develop and implement web strategy.	Helen Probart and Bill Alexander	Strategy by 31.12.07. Implementation – long-term development depending on outcomes set out in strategy.	In the long term will lead to substantial improvements in accessibility to SQA's website.
11	Investigate and report on a disability symbol system for publications.	Helen Probart	By 30.09.07	If adopted, indicate accessibility to publications.
12.	Communicate to all IT staff the over-arching policy on equality and the need to involve disabled people in project developments using a variety of involvement mechanisms.	Bill Alexander	From 5.12.06	Disabled people involved in the development of IT initiatives and projects to ensure that their needs are met.
13.	Results Online to be made accessible to disabled candidates.	David Falconer	By 2008	Accessibility to all candidates.

14.	Impact assess Health & Safety Policy as a priority.	Jacqui Faulds	By 30.6.07	Access to buildings and services checked and action taken to address any issues.
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**Eliminate harassment of disabled persons that is related to their disabilities
Promote positive attitudes towards disabled persons**

15.	Review images of people used in marketing material.	Helen Probart	By 30.09.07	People used in publications to reflect all members of society.
16.	Provide training for invigilators and visiting examiners, verifiers and assessors.	Rhona Wright	By 30.6.07	Invigilators to be consistent in their application of invigilation responsibilities. To be aware of SQA's assessment arrangements for candidates with disabilities and/or additional support needs.

Encourage participation by disabled persons in public life

17.	Review personal data collected on Appointees.	Rhona Wright	By 31.12.07	If required, to hold and make use of information on disability.
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Scottish Qualifications Authority Action Plan for 2007 – 2009

Action Plan for Human Resources & Organisational Development Directorate
Responsible for Implementation – Maidie Cahill, Director

Promote equality of opportunity between disabled persons and other persons

No.	Actions	Owner	Timescale	Outcome
1.	Screen all policies and functions for relevance and prepare schedule of impact assessments in each business area.	Sonya Alexander Pamela Nichol-Littlejohn Mary Neilson Laura Howell	Screening to be completed by 31.3.07 Impact assessments to be completed by 31.10.09	All disability relevant policies and functions impact assessed. Improvements and outcomes set out in reports to be published on website.

2.	<p>Develop equality action plan in each business area arising from the improvements and outcomes identified following impact assessment.</p> <p>Set out resource implications of identified improvements and actions for approval. Incorporate approved actions into operational plans.</p> <p>Incorporate approved actions into operational plans.</p>	<p>Sonya Alexander Pamela Nichol-Littlejohn Mary Neilson Laura Howell</p>	<p>From start of IA process - ongoing</p>	<p>All actions are captured in our performance reporting processes and fully costed before implementation.</p> <p>All planned actions and timescales will be transparent.</p>
3.	<p>Amend all HR documents into accessible font.</p>	<p>Sonya Alexander Pamela Nichol-Littlejohn Mary Neilson Laura Howell</p>	<p>By 31.12.07</p>	<p>Improved access to HR documents.</p>
4.	<p>Investigate other formats required for HR documents and incorporate actions into equality action plan.</p>	<p>Sonya Alexander Pamela Nichol-Littlejohn Mary Neilson Laura Howell</p>	<p>By 31.12.07</p>	<p>All potential formats investigated and actions agreed.</p>

5.	Ensure that all HR & OD staff participate in an equality and diversity training event and other equality related events planned.	Maidie Cahill	From January 2007 onwards	To understand the legal definition and issues of disability, to understand SQA's policy on harassment and to promote positive attitude towards disabled people.
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Eliminate discrimination that is unlawful under the Act
Eliminate harassment of disabled persons that is related to their disabilities
Promote positive attitudes towards disabled persons

6.	Review current and newly developed training programmes	Sonya Alexander Pamela Nichol-Littlejohn Mary Neilson Laura Howell	By 30.6.08	Put in place effective training programmes that, where required, raise awareness about discrimination and harassment, provide information on legislation and advise on the appropriate use of relevant policies and procedures.
7.	Review information collected and how it is used by the HR team	Sonya Alexander Pamela Nichol-Littlejohn Mary Neilson Laura Howell	December 2007	Information used to develop policy and enhance staff training.

8.	Develop and implement HR communications strategy.	Sonya Alexander Pamela Nichol-Littlejohn Mary Neilson Laura Howell (in association with Partnership Group)	By 31.12.07	Raise awareness of HR policies and procedures and the procedure for making a complaint.
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Take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons

9.	Work with Occupational Health to review procedure for providing reasonable adjustments for employees.	Sonya Alexander Pamela Nichol-Littlejohn	By 31.12.07	Straight forward procedure to provide reasonable adjustments for employees.
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**Scottish Qualifications Authority
Action Plan for 2007 – 2009**

Action Plan for Accreditation
Responsible for Implementation – George Brown

**Promote equality of opportunity between disabled persons and other persons
Eliminate discrimination that is unlawful under the Act**

No.	Actions	Owner	Timescale	Outcome
1.	Screen all policies and functions for relevance and prepare schedule of impact assessments in each business area.	George Brown	Screening to be completed by 31.3.07 Impact assessments to be completed by 31.10.09	All disability relevant policies and functions impact assessed. Improvements and outcomes set out in reports to be published on website.

<p>2.</p>	<p>Develop equality action plan in each business area arising from the improvements and outcomes identified following impact assessment.</p> <p>Set out resource implications of identified improvements and actions for approval. Incorporate approved actions into operational plans.</p> <p>Incorporate approved actions into operational plans.</p>	<p>George Brown</p>	<p>From start of IA process – ongoing.</p>	<p>All actions are captured in our performance reporting processes and fully costed before implementation.</p> <p>All planned actions and timescales will be transparent.</p>
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