

Equality Impact Assessment (supporting guidance available)

Action Plan

This section is completed at the end of the Equality Impact Assessment. Due to the importance of embedding equality in SQA through our actions the Action Plan will be the focus and record of ongoing actions.

Agreed Schedule Review Date	August 2023	Additional Schedule Review Date	
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Explain how you will monitor and record the actual impact on equality groups, including how the evidence can be revisited to measure the actual impact.

Required Actions	Owner	Date	Comment & Review
Actions taken to monitor the implementation of policy and the impact on equality groups (evidence and consultation)	AA	August 2023	Evidence will be gathered with ongoing support from other business areas

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
Update of TARE Form	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>Advance equality of opportunity</p>	AA	19/8/22	Changes made last session are still valid
Update of policy to include specific considerations around accessibility as outlined in the assessment	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>Advance equality of opportunity</p>	AA	Dec 2022	Policy will be amended at next review point. Only small wording change required

Policy Aims

Name of Policy or practice	Appointees – Engagement and Interaction
New Policy or Revision	Revised This EqIA currently covers appointees engagement and interaction with SQA. At present it covers the Conflict of Interest and Expenses policies. It will also be used to assess further policies relating to appointees where appropriate.
Name of Policy Owner	Head of Appointee Management (policy author – Manager, Appointee Management)
Date Policy Owner Confirmed Completion	

What is the rationale for this policy or practice?
<p>This EqIA has been created to specifically consider SQA appointees in relation to their engagement and interaction with SQA.</p> <p>Appointees cover all aspects of quality assurance processes from the writing and quality assuring of all assessments, to invigilating during the exams and then marking the candidates' assessments whether that is a written piece of work or a performance.</p> <p>Appointee management attracts and selects all appointees and issues annual contracts to all those involved. Training is then provided, where required, both face to face and through online courses on SQA Academy. We are responsible for reviewing and setting appointee fees and for associated communications to appointees.</p>
What evidence is there to support the implementation or development of this policy or practice?
<p><u>Conflict of Interest</u> As a regulated awarding body SQA must provide guidance to appointees in relation to conflict of interest. The General Conditions of Recognition and the Regulatory Principles require SQA to publish a Conflict of Interest policy that helps us to identify, manage and mitigate conflict of interest. This policy applies to all SQA appointees including Qualifications Development Specialists.</p> <p><u>Expenses</u> This policy relates to all SQA appointees (excluding invigilation appointees) and Qualifications Development Specialists (QDS).</p>

As a public body, SQA has a responsibility to ensure that expenditure incurred in carrying out SQA's business is reasonable and justifiable. SQA must also balance the needs of individuals who are required to travel with our commitment to sustainability.

What are the aims of this policy or practice?

Conflict of Interest

This policy outlines the principles and procedures for managing conflicts of interest for appointees in order to maintain SQA's integrity as an awarding body and to protect the validity of our qualifications, assessments and services.

Expenses

This policy aims to ensure that all appointees have a clear understanding of their entitlements and requirements when travelling on SQA business and/or incurring expenditure on SQA's behalf. This policy aims to ensure that SQA:

- safeguards the wellbeing, comfort, safety and security of appointees
- communicates our commitment to sustainability issues
- secures enhanced supplier service levels at the lowest possible cost
- consolidates expenditure to obtain discounted rates
- provides a fair and consistent approach to expenses payable to appointees

How is the content of these aims relevant to equality groups?

Conflict of Interest

This policy aims to provide clear descriptions as to what may constitute a conflict of interest and what SQA's and SQA appointees' responsibilities are in managing conflict of interests. It is the responsibility of individual appointees to recognise situations where a potential conflict of interest may arise or where others may consider a conflict exists. Appointees must disclose any potential conflict of interest and follow the process set out in this policy. These responsibilities are also set out in appointee contractual documentation.

From the list of potential conflict of interest examples provided there is no specific relevancy to equality groups or wider equality considerations.

Expenses

This policy aims to provide clear descriptions as to appointees entitlements and requirements when travelling on SQA business and/or incurring expenditure on SQA's behalf. The general aims of this policy are listed above. An initial assessment of the current policy notes the following areas which are relevant to equality groups:

It is recognised that using transportation involves a level of accessibility and there may be barriers for appointees with a disability in accessing transportation, particularly public transportation. This will be considered as part of this assessment. To note, since the COVID pandemic, the level of appointee travel has reduced greatly. SQA's verification model for example is now largely based on a virtual visiting model, reducing the impact of accessibility in respect of travel.

In relation to Section 4 of the current policy, 'General Points', it will be considered as to whether a point in relation to appointees with a disability should be expressly stated.

In relation to Section 4 of the current policy it states: Car hire may be requested when:

- this is more cost-effective than other travel options
- the distance to the destination is more than 120 miles round trip
- the destination is not on a public transport route
- you are transporting large or bulky materials

Again it will be considered whether a specific point regarding accessibility should be expressly stated. SQA's model of quality assurance is such that car hire is a very occasional occurrence now and would only authorise on a business need due to rising costs. Therefore, any change to this may not be proportionate to the need.

It is acknowledged that appointees may wish to make specific or special requests to ensure appropriate travel, accommodation and dietary requests are provided through use of the 'TARE' form. It is presumed at this time that the TARE form currently addresses all additional requests; however, further consideration of the TARE form will be undertaken as part of this assessment.

The use of taxis, and the language provided within the policy will also be considered to ensure that it meets the needs of appointees who may require additional support.

Comments in relation to parking at airports will also be considered as part of this assessment.

Comments in relation to taxi pick ups from Waverly Station will also be considered to ensure that sufficient detail is in place in respect of access to the pick up point and ensuring that taxis are in place which can pick up appointees with accessibility requirements.

Evidence, Consultation and Engagement

What stakeholders have you engaged with in the development of this policy or practice?

Conflict of Interest

Internal evidence sources collected and reviewed:

- lessons learned from existing processes. A review was undertaken of how information was previously submitted, reviewed and how decisions were made. This informed the current policy.
- feedback from SQA colleagues. As part of the review process, internal colleagues were consulted and opinions were gathered on both good and poor practices.
- review of previous conflict of interest claims. Previously recorded claims were scrutinised to gather additional intelligence on type of conflict, who claim had been submitted to and how decisions were made.

External evidence sources collected and reviewed:

- feedback from appointees. Selected appointees were consulted about previous experience in reporting ('conflict of interest) 'Col' to inform current practice.
- specific requests from appointees. Selected appointees were consulted about previous experience in reporting Col to inform current practice as not all requests were in fact Col.
- claims of potential conflict of interest from external sources. Previous claims of Col from stakeholders were reviewed to inform and clarify wording of policy
- feedback from appointee surveys. Previous appointee surveys were reviewed for comments in relation to Col to again inform current policy.

Information is collected on an ongoing basis from appointees. All disclosures are currently managed on a case-by-case basis.

Expenses

Internal evidence sources:

- lessons learned from existing processes
- feedback from SQA colleagues [requests considered on an individual basis at present, requests to Senior Operating Manager, HNVI – deploying team, issues re requests are sanctioned. Requests not currently collated to show evidence of how many requests for accessibility as an example.]

External evidence sources:

- feedback from SQA appointees - Information is gathered on a case-by-case basis, not collated for wider learning. Also receive complaints about expenses. Teams booking hotels have knowledge of access and may not be used.

- specific requests from appointees
- feedback from appointee surveys
- feedback from TARE booking forms

Information is currently collected on an ongoing basis from appointees and all requests for additional support are managed on a case-by-case basis.

What evidence about equality groups do you have to support this assessment?	
Age	<u>Conflict of Interest</u>
Disability	<p>This policy provides information to appointees and SQA employees about the management of conflict of interest matters reported to SQA. It provides appointees with a non-exhaustive list of instances which might constitute a conflict of interest. Further it provides support to appointees about how conflict of interest matters should be reported to SQA. In summary the policy applies to all appointees who are contracted to work for SQA. There is no evidence to suggest that this policy and wider impact has any relevancy to equality groups. This policy is continually monitored and SQA will continue to analyse feedback from appointees to inform the development of this policy.</p>
Race	
Religion or Belief	
Sex	
Sexual Orientation	
Gender Re-assignment (Gender identity and transgender)	<p>Where it is determined that a conflict of interest notification may be affected by circumstances out with an appointees control and where this information is provided by the appointee, consideration will be taken to review the policy to mitigate any adverse or negative impact.</p>
Marriage/Civil Partnership	<u>Expenses</u>
Pregnancy / Maternity	<p>No information is currently collated about appointees in relation to equality matters. Where appointees request additional assistance, this is managed on case-by-case basis with the appointee provided with the appropriate assistance. It is acknowledged that requests for additional assistance are mainly in respect of accessibility/mobility requests, and therefore disabled appointees would most likely place a request for additional assistance. This is done through a 'TARE' and all requests are managed by SQA colleagues. No specific information in relation to protected characteristics is requested from appointees for their requests to be processed and therefore SQA does not hold specific information in relation to an appointee's Protected Characteristic in order to fulfil a request for additional assistance.</p>
Care experience (where relevant)	

Impact and Opportunities for Action

The impact that a policy or practice has on an equality group may be different and this requires to be recorded. The impact may not always be negative. Actions are taken to address any differential impact, and include actions to mitigate against any negative impact, to advance equality and to foster good relations between groups.

Each section contains questions for each equality group. These questions are here to support consideration; however, you can provide further detail. Focus initially on the equality groups that would be affected by this policy. If you do not consider that certain equality groups would be affected by this policy, you may leave these sections.

Protected Characteristic	General Equality Duty
<p>Disability</p> <p>Religion or Belief</p> <p>Pregnancy</p> <p>Sex</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>As outlined previously there are specific areas within the Appointees Expenses policy which have relevancy to equality groups and the impact of these areas will be considered as to what impact they may have on appointees with the protected characteristics of Disability, Religion or Belief and Pregnancy.</p> <p>These three equality groups are potentially the most impacted by these areas due to accessibility considerations: dietary requirements and the request for childcare. However, it is acknowledged that by considering the perceived impact on these three equality groups and adjusting the policy and supporting processes to reflect the findings of this assessment, there is the potential to support other equality groups.</p> <ul style="list-style-type: none"> • Accessibility requirements for transportation, including taxis, use of own car and public transportation; airport parking; taxi pick up points <p>[Disability; Pregnancy]</p> <p>Appointees who make a special request will be treated on an individual basis. The current request process allows appointees to submit requests in order for them to fully access appropriate transport. It is acknowledged that our current structure of working through more virtual means has allowed appointees to attend/engage in activities both in person and remotely. This has promoted more inclusive ways of working with the perceived positive impact that it has on appointees with a disability and appointees from other equality groups.</p> <ul style="list-style-type: none"> • Inclusion of accessibility as a determining factor

Disability

At present all requests are submitted via the TARE form. This allows appointees to submit requests for additional support with transportation and hotel accommodation. These TARE forms are considered on a case-by-case basis; however, it is acknowledged that such requests may require to be clearly expressed within the policy to ensure consistent and transparent decision making.

- Review of TARE form to ensure sufficient consideration of travel; accommodation; dietary requests; other needs is included [suggestion to have TARE form altered],

[Disability; Religion or Belief; Pregnancy]

As noted, all requests are submitted via a TARE form. Whilst the current form is considered fit for purpose as it allows appointees to submit requests, at the next review of the TARE form it should be considered whether the TARE form is fully accessible to all appointees in submitting additional requests.

In summary it is considered that the Appointees Expenses policy has an overall positive effect on equality groups. Appointees are provided with a transparent and fair process to submit all additional requests. These forms are considered on a case-by-case basis with the view that appointees will be provided with the additional support that is appropriate and necessary to carry out the duties of their role.

This policy applies to all appointees, and all appointees can submit TARE requests for additional assistance.

It is acknowledged that upon further review of the Expenses Policy and TARE form that any adjustments to the policy and form should be considered to ensure that the form is fully accessible and whether the inclusion of accessibility considerations as a determining factor should be clearly expressed within the policy.

Advance equality of opportunity

It is considered that this policy (Expenses) has a positive impact on the equality groups listed as it ensures that appointees who require additional assistance have a transparent process in place to submit all requests. This allows appointees who may have a PC to be appropriately supported and therefore engaged in SQA duties.

	Foster good relations
	For appointees to have an understanding of how to submit additional requests, the policy requires to be fully communicated to appointees. Through training appointees are provided with details as how to submit requests for additional support.

Rationale

If you are proceeding with a decision that may have a negative impact and are not putting in place actions to mitigate against this, please explain how this is objectively justified.
Not Applicable