

## 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	June 2026	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 <b>monitor the implementation of policy and the impact on equality groups</b> (evidence and consultation)			[ONGOING RECORD]
[LIST]			
<b>Maintain and monitor Gifts Register for staff to log gifts</b>	<b>Procurement Manager</b>	<b>Ongoing</b>	

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
[LIST]	[CROSS REFERENCE]			

## Policy Aims

<b>Name of Policy or practice</b>	Gifts & Hospitality policy
<b>New Policy or Revision</b>	Revision
<b>Name of Policy Owner</b>	Procurement Manager
<b>Date Policy Owner Confirmed Completion</b>	May 2024

<b>What is the rationale for this policy or practice?</b>
<p>The contents of the policy are broadly set out by the Scottish Public Finance Manual. Relevant segments from the handbook are:</p> <ul style="list-style-type: none"> <li>• 15. Relevant finance officials should be made aware of all gifts made or received to enable the compilation of notes to the annual accounts. Property Advice Division and the Financial Reporting Unit should also be informed of relevant gifts involving assets to enable the SG Property Database and the SG Assets Register to be updated.”</li> <li>• A gift is something voluntarily given or donated without the expectation of receiving anything in return and generally without preconditions.</li> <li>• Hospitality/Gifts</li> <li>• 18. Guidance on the acceptance of hospitality/gifts, etc. by Ministers is included in the <a href="#">Scottish Ministerial Code</a>. Detailed guidance on the acceptance of gifts and hospitality by members of staff should be made available on organisational intranets. The guiding principles should be: <ul style="list-style-type: none"> <li>• an individual’s conduct should not foster the suspicion of any conflict between official duties and private interests.</li> <li>• an individual’s actions, when acting in an official capacity, should not give the impression of having been influenced by a gift or consideration to show favour or disfavour to any person or organisation.</li> <li>• if an individual is in doubt about the propriety of accepting a gift or an item of hospitality the relevant Human Resources advisers must be</li> </ul> </li> </ul>
<b>What evidence is there to support the implementation or development of this policy or practice?</b>

We know that staff across SQA are often in receipt of gifts as a part of the work. SQA has maintained a gift register since 2012, where staff disclose gifts that they have received through their work. There are 61 entries in the register since 2012, indicating that staff may regularly receive gifts, which may affect their impartiality in the job. SQA will continue the gift register as a part of this policy's operation.

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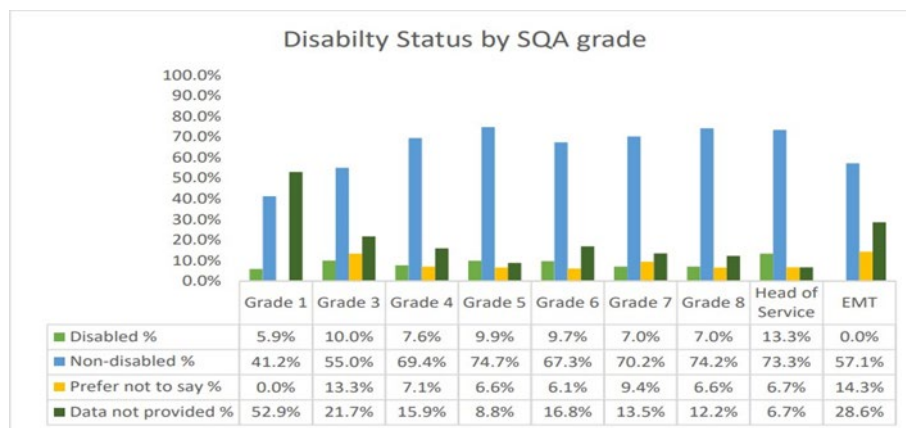
What are the aims of this policy or practice?
The Gifts & Hospitality policy sets out responsibilities of staff to declare and record any gifts, hospitality or sponsorship given over a certain value. This policy is intended to provide guidance of what staff can be gifted and what can be gifted on behalf of SQA.

How is the content of these aims relevant to equality groups?
As this policy applies to all SQA staff, we acknowledge that there are a number of SQA staff with equality protected characteristics.

## Evidence, Consultation and Engagement

What stakeholders have you engaged with in the development of this policy or practice?
Policy will be circulated to the Trade unions and Management Team to sign off and then circulated to all staff via the Intranet

What evidence about equality groups do you have to support this assessment?	
<b>Age</b>	<p>Internal Evidence</p> <p>The majority of SQA employees are in the mid-range age bandings. A total of 79% workers are aged between 30 – 59. Less than 2% of SQA employees are aged 60+ and the SQA has recently seen a decrease in younger (under 35) employees.</p> <p>Comparisons between 2019 and 2020 data show that the greatest increase in the proportion of female colleagues is within the 60–64 age band - an increase of 12 colleagues.</p> <p>The 30–34 age band saw the largest reduction of female colleagues – a total of seven people. Over the same period, there was an increase in the proportion of male colleagues within the 50-54 age band - an overall increase of nine people. The largest decline in the proportion of male colleagues was in the 30-34 age band, with seven fewer people. The largest decrease was seen in the 30–34 age band for both male and female colleagues - with an overall reduction of 14 people.</p> <p>Source: SQA Workforce Equality Monitoring Report 2019 - 2021  <a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a></p> <p>The SQA Gift register does not record the age of the person in receipt of the gift.</p>
<b>Disability</b>	<p>Internal Evidence</p> <p>A total of 8.2% of SQA employees declared a disability last year. Declaration rates have significantly improved from a total response rate under the Not Disclosed / Prefer not to say category of 49.9% in 2019 (roughly half of employees) to a much reduced 23.1 % in 2020.</p>



The bar chart above illustrates Disability Status by SQA grade.

The grade split by disability shows the following:

- ◆ 8.3% of the workforce have declared a disability; 69.4% are non-disabled; 7.4% 'prefer not to say'; and 14.9% have not yet provided data.
- ◆ Heads of Service have the highest overall concentration of colleagues declaring a disability at 13.3%, followed by grades three and five both with 10.0% and 9.9% colleagues, respectively.
- ◆ The percentage of colleagues at grades one to three who have declared a disability is 9.1%.
- ◆ The percentage of colleagues at grades four to six who have declared a disability is 9.0%.
- ◆ The percentage of colleagues at grades seven and eight who have declared a disability is 7.5%.

Source: SQA Equality Mainstreaming Report 2019 – 2021

[https://www.sqa.org.uk/sqa/files\\_ccc/sqa-equality-mainstreaming-report-2019-21.pdf](https://www.sqa.org.uk/sqa/files_ccc/sqa-equality-mainstreaming-report-2019-21.pdf)

The SQA Gift register does not record the disability status of the person in receipt of the gift.

<b>Race</b>	<p>Internal Evidence</p> <p>For the purposes of this section, colleagues have been split into groups of minority ethnicity, white ethnicity, prefer not to say, and not provided. A further breakdown of black and minority ethnicity colleagues follows later in the report. Although we have seen an overall increase in ethnicity data, 12.96% of colleagues (123), have chosen not to provide an answer and 3.48%, 33 colleagues, have declared they would prefer not to say. This illustrates that there is more work to be done to educate colleagues on the importance of providing equality data. As illustrated in table 1.12, the number of ethnic minority colleagues has increased since 2019 to 30 which equates to an increase of 1.34%. Race 2019 2020 Variance Ethnic Minority 1.82% 3.16% 1.34% White 56.06% 80.40% 24.34% Prefer Not to Say 1.07% 3.48% 2.41% Not Provided 41.05% 12.96% -28.09</p> <p><a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a></p>
	The SQA Gift register does not record the race of the person in receipt of the gift.
<b>Religion or Belief</b>	<p>Internal Evidence</p> <p>86.72% of colleagues have provided information relating to their religious beliefs in 2020. This represents a total of 823 colleagues and an increase of 30.13% on 2019. The increase is spread across all religions or beliefs. 283 colleagues declared Christian as their religion or belief in 2020. This is an increase of 9.13% (90 colleagues) from 2019. 164 colleagues declared non-Christian religion or belief, an increase of 57 (5.81%) from 2019. 287 colleagues declared no religion or belief, which is an additional 8.61% (94). There was an increase of 6.58% colleagues (63) declaring they would 'prefer not to say'.</p> <p><a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a></p>
	The SQA Gift register does not record the religion of the person in receipt of the gift.
<b>Sex</b>	<p>Internal Evidence</p> <p>Comparisons between 2019 and 2020 data show that the greatest increase in the proportion of female colleagues is within the 60–64 age band, 1.91%, an increase of 12 colleagues. The 30–34 age band saw the largest fall of 1.50% (seven) amongst female colleagues. Over the period there was an increase in the proportion of male colleagues within the 50-54 age band, with 2.39% more male colleagues, an increase of nine. The largest decline in the proportion of male colleagues was in the 30-34 age band, with 2.00% (seven) fewer. The largest decrease was seen in the 30–34 age band for both male and female colleagues, with a reduction of 14 colleagues. This appears to be offset by an increase of 14 colleagues in the 35–39 age band.</p> <p><a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a></p>
	The SQA Gift register does record the sex of the person in receipt of the gift.
<b>Sexual Orientation</b>	<p>Internal Evidence</p> <p>Colleagues identifying as heterosexual/straight showed the largest increase at 24.41% (239). There was also an increase of 5.22% (50) in colleagues selecting 'Prefer not to say'. This highlights that there is further work to be done to educate colleagues on the benefits of declaring their equality data.</p>

	<a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a>
	The SQA Gift register does not record the sexual orientation of the person in receipt of the gift.
<b>Gender Re-assignment (Gender identity and transgender)</b>	SQA does not collect data on the gender re-assignment or trans status of staff. Similarly, the gift register does not record this information.
<b>Marriage/Civil Partnership</b>	<p>Over the period 1 February 2019 to 31 January 2021, retention of colleagues by relationship status showed that 100% of colleagues who declared they were either married or in a civil partnership are still employed with the organisation. Of those colleagues who left the organisation, the highest proportion (61.76%) did not declare this information. This equates to 12 colleagues, seven of whom left prior to the equality campaign.</p> <p><a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a></p>
	The SQA Gift register does not record the marital status of the person in receipt of the gift.
<b>Pregnancy / Maternity</b>	<p>In 2020 1.05% or six female colleagues had a period of maternity leave in 2020. This was a reduction of 0.70% from 2019. The majority of colleagues who had a period of maternity leave in either year were grades 4 to six. In 2019, 95.24% of colleagues who had a period of maternity leave returned to work. Two did not return to work following maternity leave in 2019 (grade 3 and grade 4). For 2020, this figure increases to a 100% return to work rate following a period of maternity leave. Only high-level information can be shared to ensure compliance with GDPR legislation protecting individuals' personal information.</p> <p><a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a></p>
	The SQA Gift register does not record the this status orientation of the person in receipt of the gift.
<b>Care experience (where relevant)</b>	The SQA Gift register does not record the care experience of the person in receipt of the gift.



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## 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
Age	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>The age distribution of colleagues remained similar between 2019 and 2020 with the majority of colleagues (79.24%) aged between 30 and 59. The largest increase is in the proportion of colleagues who are age 60-64, (1.91%) which equates to 19. The greatest decrease was seen in the 30-34 age band with 1.70% fewer colleagues, a reduction of 14.</p> <p>The highest proportion of colleagues who have declared a disability, 52.56%, falls within the lowest age bands (16–44) and second highest (47.44%) within the upper age bands (45–64).</p> <p>Source: SQA Workforce Equality Monitoring Report 2019 - 2021</p> <p><a href="https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf">https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</a></p>
	The gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. It is not proportionate to reflect this data"
	Advance equality of opportunity
	There is no evidence to suggest that this policy has a negative impact on staff who based on their age.

	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Disability</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Policy is applied to all staff in the same manner regardless of their disability.
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	Advance equality of opportunity
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Race</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Policy is applied to all staff in the same manner regardless of their race
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24

	Advance equality of opportunity
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Religion or Belief</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Policy is applied to all staff in the same manner regardless of their religion or beliefs
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	Advance equality of opportunity
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Sex</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Policy is applied to all staff in the same manner regardless of their sex

	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	Advance equality of opportunity
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Sexual Orientation</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Policy is applied to all staff in the same manner regardless of their sexual orientation.
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	Advance equality of opportunity
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Gender Re-assignment</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

<b>Gender identity and transgender</b>	Policy is applied to all staff in the same manner regardless of their gender
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	<b>Advance equality of opportunity</b>
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	<b>Foster good relations</b>
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Marriage/Civil Partnership</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	No evidence to suggest that a person marriage / civil partnership status is impacted by this policy
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	<b>Advance equality of opportunity</b>
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	<b>Foster good relations</b>
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>

<b>Pregnancy / Maternity</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	This policy does collate information on their pregnancy/maternity status. Is applied to all staff regardless of their maternal status.
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	Advance equality of opportunity
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.
<b>Care Exeperience</b>	<b>General Equality Duty</b>
	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	This policy does not collate information on staff based on the care experience
	At current, the gift register does not collect information on the protected characteristics of the recipient, and so it is not possible to say where there may be a differential impact. An action has been taken to collect this information in the new financial year 2023/24
	Advance equality of opportunity
	It is not clear with the current evidence how this policy might promote the equality of opportunity for any group.
	Foster good relations
	In such a litigious area such as this, it is unlikely that a policy could foster good relations. However, the ability to show that no one demographic will accept gifts over others can help to break down stereotypes.

## 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.

No negative impacts have been identified.