# SQA EQUALITY IMPACT ASSESSMENT

Please read the [Equality and Human Rights Commission Guidance on assessing impact.](#)

## 1. Name of policy/procedure/proposal/project/decision*

*Referred to as 'policy' hereafter.

| POLICY NAME | Recruitment and Selection Policy |
|---|---|
| COMPLETED BY | Equality Impact Assessment Working Group |
| HEAD OF SERVICE | Head of Human Resources |
| DATE | 21 May 2021 |
| NEXT SCHEDULED REVIEW DATE | TBC in line with policy schedule |

## 2. What is main purpose of the policy?

To ensure a fair, consistent and inclusive approach is taken for internal and external recruitment in line with SQA values of trusted, progressive and enabling and the principles outlined in SQA Equalities Policy.

SQA wishes to ensure that recruitment practices are in accordance with General Data Protection Regulation (GDPR) and that everyone involved understands their responsibility for the management and security of personal data during recruitment campaigns.

## 3. What information, and evidence, is being used to evaluate the impact of this policy on people who share protected characteristics?

In order to evaluate the impact of this policy on employees who share protected characteristics ,

and in addition to members from Human Resources and Equality & Diversity, we have included representatives from our two recognised unions, Unite and Unison, who can feedback on behalf of their representatives' and members' experiences.

We have also included representatives from SQA's employee networks – ACE (Appreciate Culture & Ethnicity), Disability, Rainbow, Women's, who are able to provide valuable feedback from a significant part of the organisation.

We have also considered the guidance on Disability Confident recruitment and information on barriers to recruitment from Lexxic organisation who empower neurodiversity in the workplace.

Once published, we will also be able to consider the contents of SQA Equality Mainstreaming report.

## PUBLIC SECTOR EQUALITY DUTY

SQA is required to have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.

This section provides the opportunity to capture how the policy will contribute towards the three aims of the general equality duty, and to consider if there is anything more we need to do to meet our responsibilities.

**4. How might this policy impact on people who share protected characteristics? Please consider positive or negative impacts. (At the beginning of the process, you may want to record perceived impact — ongoing monitoring of the policy will allow you to measure the actual impact of the policy).** Please copy this symbol into the applicable boxes: ✓

| Protected Characteristic | Neutral impact | Positive impact | Negative impact | Please provide more information |
|---|---|---|---|---|
| Age | ✓ | | | Consideration into different age groups having different sets of skills, qualifications, and experience. The recruitment and selection policy should determine that each competency is of equal value and individually assessed.<br><br>Older applicants may have different qualifications.<br><br>Younger applicants may not have as much experience therefore recruiting managers should be mindful of not asking for too much experience unless in exceptional circumstances. |
| Disability | | ✓ | | Positive considerations for reasonable adjustments and supporting documents for disability confident applicants.<br><br>Consideration of conditions impacting an employee's absence triggers. The requirements for converting a temporary post to permanent may need slight adjustment to say each case will be considered individually.<br><br>If an applicant is suffering from a long- term or underlying condition, the 2 week advertising period may not be long enough for them to complete and submit their application. |

| | | | | Consideration to be given to including a practical list of what reasonable adjustments look like, albeit this would not be exhaustive e.g. timing of interviews – an applicant may perform better in the morning.<br><br>Ensure eRecruiter meets disability criteria in relation to changing format or view.<br>Information about Disability Confident high level, clear link to more information to be considered. |
|---|---|---|---|---|
| Marriage/civil partnership | ✓ | | | Content that there are no equality concerns. |
| Race | ✓ | | | Wording in relation to security checks is legal terminology which may be difficult for applicants to understand, for example, if English is not their first language.<br><br>Qualifications could be from out with the UK. |
| Religion/belief/non-belief | | ✓ | | 'Happy to talk flexible working' may provide support for religious practices. |
| Sexual orientation | ✓ | | | The policy does not make specific mention to sexual orientation.<br><br>Consideration should be given to include a stronger commitment to actively attracting applications from suitably qualified lesbian, gay and bisexual applicants by specifically advertising in LGBT+ media outlets.<br><br>Include meaningful commitment to SQA being an inclusive employer and not tolerating any bias or discrimination in the recruitment and selection process. |
| Gender re-assignment (gender identity and transgender) | ✓ | | | Consideration of conditions impacting an employee's absence triggers. The requirements for converting a temp post to perm may need slight adjustment to say each case will be considered individually.<br><br>Attracting applications from suitably qualified trans job seekers by specifically advertising in LGBT+ media outlets<br><br>This policy makes no mention of SQA being an inclusive employer and not |

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| | | | | tolerating any bias or discrimination in any aspect of the recruitment and selection process. |
| Pregnancy/maternity | ✓ | | | 'Happy to talk flexible working' shows SQA are taking into consideration personal circumstances.<br><br>When evaluating competencies for roles, consideration should be given to having a holistic approach rather than based on cumulative experience as applicants who have taken time to have a family or undertake caring responsibilities could be significantly disadvantaged.<br><br>Consider highlighting that SQA will welcome applications from people who are pregnant or on maternity/adoption leave. |
| Sex | ✓ | | | When evaluating competencies for the work encourage manager to take a holistic approach and not focus solely on cumulative experience that can favour applicants with no gaps in their employment due to pregnancy, childcare or other caring responsibilities more commonly undertaken by women.<br><br>Consider removal of title and first name in application form so sex is not identified, eg Mr John Example would change to J Example.<br><br>Approval of vacancies – The policy states that manager will consider if the post can be filled with a flexible work pattern. A more women friendly policy could recommend/instigate that all posts are considered flexible by default and that if the post cannot be flexible this should be justified and documented.<br><br>Gender equality is not specifically mentioned in the policy. We would like to see written commitment from SQA that job opportunities will be unaffected by gender. Gender equality is not about implying men and women are the same, but recognising that they have equal value, and should receive equal treatment. |

| Care experience (where relevant) | | ✓ | | Consideration to be given to benchmarking in this area from other organisations.<br><br>Consideration to be given to recruiting managers seeing gaps in employment or difficulty with references.<br><br>Reasonable adjustments could be more explicit but not an exhaustive list. |
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**5. What arrangements could be implemented to reduce or mitigate any potential adverse or negative impacts identified above?**

Ensure that all stakeholders involved in the recruitment and selection process are trained in equal

opportunities, diversity, employment law, interview skills and avoiding unconscious bias, treating all applicants fairly and with respect.

Ensure recruiting managers understand job selection criteria and that they don't ask questions about aspects such as a disability, pregnancy, sexual identity, religious beliefs, world views, age or ethnicity unless the question is directly related to the job on offer.

Ensure job advertisements don't contain images or descriptions that might alienate potential applicants.

Provide link to how retained equality information will be used (transparency) i.e. age brackets or sex are older applicants successful or what is the male: female application/appointed ratio

Advertising of posts – consider monitoring and gathering segregated data on who applies depending on the channels used to evaluate what channels promote more diversity.

Selection of applicants – consider gathering and analysis segregated data on who gets selected to evaluate if unconscious or conscious bias is likely.

Stronger commitment from SQA to the recruitment and promotion of colleagues who identify as LGBT+ within our organisation. Diversity in itself does not create inclusion – an inclusive environment must be intentionally designed, nurtured and supported. Instead of just stating that 'SQA welcomes applications from every section of the community' we should be visibly promoting the Rainbow Network and our commitment to LGBT+ equality.

The policy briefly mentions 'equality monitoring' but does not specify how this data will be reviewed and what actions will be taken (or who is responsible). We would like to see a commitment to this data being actively monitored and steps taken to ensure our workforce is truly reflective of the communities that we all live within and serve. The organisation needs to be far more transparent and, in my view, equality monitoring data should be anonymised and presented to the Rainbow Network (and rest of company) to demonstrate our commitment to diversity and equality. This would also ensure that there is accountability when it comes to the organisation recruiting from minority groups.

Our recruitment and selection policy and processes should be designed to be gender–neutral. Gender–neutral language could be used within the policy, our job descriptions and application forms (asking people for their preferred pronouns as opposed to gender, etc).

This policy should foster a culture of transparency throughout the organisation, a culture where employees feel they can share their feedback and report intolerant behaviour experienced throughout the recruitment and selection process in a safe environment where they will be carefully listened to. I think there should be part of the policy.

Reference to the online portal to apply for vacancies. Drop down box does not have an option for non-binary candidates (Mx).

**6.    If you are proceeding with a decision that may have a negative impact despite the mitigatory arrangements identified in Step 5, are you satisfied that this is objectively justified, ie a proportionate means of achieving a legitimate aim? Please provide explanatory details.**
N/A

**7.    Could this policy be revised or changed to better meet the general equality duty?**
Equality in recruitment and selection is very important and SQA as an employer should be encouraging and promoting inclusion and diversity in the workplace. This policy does not mention equality, diversity or inclusion, just disability.

To ensure we cover all protected characteristics and also our networks, the words 'inclusive' and 'diversity' seem to not be mentioned. They seem implied in our process, but it would be useful to have this clearly indicated in our policy document to show clear demonstration of inclusivity and diversity.

Consider positive action in recruitment - positive action in recruitment and promotion applies where an employer reasonably thinks people with a particular protected characteristic are disadvantaged or disproportionately under-represented and therefore treats them more favourably.

Monitor candidate aspects such as gender, ethnicity and age at each stage of your selection process to check for adverse impact.

**8.    Has there been consultation/is consultation planned with people who will be affected by this policy/procedure/project/decision? Please detail below how this has affected your decision making.**
Consultation with union representatives, employee networks and members of SQA Equality & Diversity team has been completed which represents a significant part of the workforce within SQA.

**9.    How will this policy be monitored and evaluated?**
The policy owner will be responsible for reviewing and monitoring this policy on a regular basis to ensure that it is fit for purpose and in line with relevant legislation. Recruiting managers also have a responsibility for ensuring consistency, fairness, and equity throughout the recruitment and selection process.

General Equality Duty: eliminate discrimination, advance equality; foster good relations

## ACTION PLAN

| Action: | Owners: |
|---|---|
| Continue to monitor our equality data for recruitment and selection ensuring no one is unfairly treated because of their age, disability, race, religion, sex, pregnancy or maternity, marital status, sexual orientation, or gender re-assignment. | HR Analytics and Systems/Equalities |
| Commit to a timescale for the Recruitment & Selection Policy to be reviewed. | Policy Review Group |
| Establish and communicate mandatory recruitment and selection training for all stakeholders (and refresher training where appropriate) which includes equal opportunities, diversity, inclusion, employment law, interview skills and avoiding unconscious bias. | Organisational Development |
| Recruiter application form considerations – depending on the equality data required for reporting. | HR Analytics and Systems |
| Consider addition of 'diversity' and 'inclusion' to policy. | Policy Review Group |
| Make it clear what happens to equality monitoring data. | HR Reward/Equalities |
| Reasonable adjustments within the process expanded upon. | Policy Review Group |
| Consideration to absence and performance requirements for secondment and the move from temporary to permanent. | Policy Review Group |

Signed:     Julia Welsh and Zoey Marshall (EIA Working Group Leads)

Date:     21 May 2021