

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	Whistleblowing Policy and Procedure
COMPLETED BY	Equality Impact Assessment Working Group
HEAD OF SERVICE	Head of Human Resources
DATE	22 July 2021
NEXT SCHEDULED REVIEW DATE	TBC in line with policy schedule

2. What is main purpose of the policy?

To provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing.

It sets out the procedure by which 'workers' can report concerns to us about workplace practices, without fear of reprisals. Any 'worker' reporting a concern is protected when making a disclosure in the public interest by the Public Interest Disclosure Act (1998).

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 have shared protected characteristics we have sought feedback from colleagues in Human Resources and Equality & Diversity, as well as 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 reasonable adjustments for those with protected characteristics during whistleblowing proceedings.

Once available, we will also review and consider any data trends relating to whistleblowing on those with protected characteristics.

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	✓			Policy applied equally to all. No concerns.
Disability	✓			Reasonable adjustments positive e.g. being accompanied at meetings. Take into consideration the mental health impact on staff with links and guidance on mental health first aiders. One overall link in all policies to a reasonable adjustment document which looks at different support options available and how to request any reasonable adjustments.
Marriage/civil partnership	✓			Policy applied equally to all. No concerns.
Race	✓			Policy applied equally to all. No concerns.
Religion/belief/non-belief	✓			When scheduling meetings, SQA should be mindful of religious commitments, for example. Support for employees to chat through policy if English is not their first language. They may also require support to present their case at a grievance hearing, for example.
Sexual orientation	✓			Policy applied equally to all. No concerns.
Gender re-assignment (gender identity and transgender)	✓			Policy applied equally to all. No concerns. When scheduling meetings, SQA should be mindful of where an

				employee might be on their journey and any medical appointments.
Pregnancy/maternity	✓			When scheduling meetings, SQA should be mindful of other medical commitments and pregnancy related health conditions, if applicable.
Sex	✓			Depending on the circumstances, may be more comfortable with a panel of a particular gender. Be mindful of menopause health conditions.
Care experience (where relevant)	✓			The policy applies equally to all.

5. What arrangements could be implemented to reduce or mitigate any potential adverse or negative impacts identified above?

Consider wording used in the policy (section 5.3 - 'If you choose to make a disclosure without following this procedure you may not receive the protection outlined in this section.') to encourage, support and protect employees reporting any potential wrongdoings.

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?

Throughout the policy there is reference to putting any potential allegations in writing. We suggest including more verbal options for colleagues to initially speak to someone about the procedure, provide support and discuss any possible concerns where relevant.

Consider a reasonable adjustment document for any manager or employee to refer to which includes potential different support options and how employees request these reasonable adjustments. A link can then be provided in each policy.

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.

ACTION PLAN

Action:	Owners:
Review of section 5.3 to encourage, support and protect employees reporting any potential wrongdoings.	Policy Review Group
Equalities Policy to be added to Associated Policies (Policy Section 7).	Policy Review Group
Consider a reasonable adjustments document and guidance for managers and employees.	Policy Review Group
When available, monitor whistleblowing data in relation to protected characteristics.	HR Shared Service/HR Analytics & Systems
Consider other forms of reporting whistleblowing (verbal).	Policy Review Group
Review of section 5.3 to encourage, support and protect employees reporting any potential wrongdoings.	Policy Review Group

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

Date: 23 July 2021