

# 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.

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|------------------------------------|----------------------|--|------------------|
| <b>Agreed Schedule Review Date</b> | <b>December 2024</b> | <b>Additional Schedule Review Date</b> | <b>June 2023</b> |
|------------------------------------|----------------------|--|------------------|

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.

| <b>Required Actions</b>   | <b>Owner</b>                           | <b>Date</b> | <b>Comment &amp; Review</b> |
|---|--|-------------|-----------------------------|
| Actions taken to <b>monitor the implementation of policy and the impact on equality groups</b> (evidence and consultation)  |  |             | <b>[ONGOING RECORD]</b>     |
| This policy will be reviewed by the Information Governance Manager every 2 years, unless required sooner by operational or legislative change, to ensure that it remains fit for purpose.<br><br>Updates will be made to the policy where necessary as a result of that review. | <b>Information Governance Manager.</b> | <b>2024</b> | n/a                         |

| <b>Identified Actions</b>   | <b>General Equality Duty</b>                                | <b>Owner</b>   | <b>Date</b>     | <b>Comment &amp; Review</b>                      |
|---|---|--|-----------------|--|
| Publication of policy and equality impact assessment.   | Advance equality of opportunity                             | <b>Information Governance Manager</b>                    | <b>Dec 2022</b> |  |
| Communication of policy to staff.   | Advance equality of opportunity<br>Foster good relations    | <b>Information Governance Manager</b>                    | <b>Dec 2022</b> |  |
| Communication of complaints process to staff – this will occur in conjunction with communication of policy. | Advance equality of opportunity<br>Foster good relations    | <b>Information Governance Manager</b>                    | <b>Dec 2022</b> |  |
| Review of signage to ensure it is accessible.   | Eliminate discrimination<br>Advance equality of opportunity | <b>Information Governance Manager/Facilities Manager</b> | <b>Jan 2023</b> | Facilities to review signage by end of Jan 2023  |
| Review of training provided to users of the CCTV system.  | Eliminate discrimination                                    | <b>Information Governance Manager/Facilities Manager</b> | <b>Jan 2023</b> | Facilities to review training by end of Jan 2023 |

## Policy Aims

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| <b>Name of Policy or practice</b>             | CCTV Policy  |
| <b>New Policy or Revision</b>                 | Revision   |
| <b>Name of Policy Owner</b>                   | Director of Finance and Corporate Services<br>Information Governance Manager (policy author) |
| <b>Date Policy Owner Confirmed Completion</b> | November 2022  |

### What is the rationale for this policy or practice?

SQA's CCTV system is for the following purposes: (i) to provide a safe and secure working environment for employees, other workers, and visitors to SQA premises, and (ii) for the detection and prevention of crime to protect SQA staff, property and equipment

This policy outlines the safeguards in place for the deployment, operation of and access to CCTV systems in place within SQA buildings and the images captured by them.

This policy will be published on SQA's intranet ensuring it is available to all SQA staff.

### What evidence is there to support the implementation or development of this policy or practice?

This policy has been developed in accordance with good practice guidance and legal requirements. These include:

- ◆ Human Rights Acts 1998
- ◆ United Kingdom General Data Protection Regulation/Data Protection Act 2018
- ◆ Freedom of Information (Scotland) Act 2002
- ◆ Information Commissioner's Office (ICO) Code of Practice for Surveillance Cameras and Personal Information

**What are the aims of this policy or practice?**

This policy aims to ensure that SQA deploys and operates CCTV in a way that complies with the minimum standards set out in the Data Protection Code of Practice for Surveillance Cameras and Personal Information (referred to in this policy as “the ICO code”), published by the ICO.

The policy clearly sets out the purposes for which SQA’s CCTV system can be used and images accessed as well as the responsibilities of those charged with operating the CCTV system.

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

SQA’s CCTV system will capture images of individuals within equality groups.

**Evidence, Consultation and Engagement**

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

This policy was shared with representatives from SQA’s unions (Unite and Unison) and consultation was undertaken with staff network groups.

[To date] No issues were identified to the policy owner in respect of the content or potential impact of the policy.

**What evidence about equality groups do you have to support this assessment?**

**Age  
Disability  
Race  
Religion or Belief  
Sex  
Sexual  
Orientation**

This policy is a factual and procedural document that sets out clear requirements regarding the location, purposes and use of SQA’s CCTV system and the images captured by it. The CCTV system itself captures images of all individuals equally.

As a result, data or wider evidence is not captured nor wider monitoring of this policy undertaken on equality groups. They set out the requirements for the protection and safe use of SQA’s information assets.

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| <b>Gender Re-assignment<br/>(Gender identity and transgender)<br/>Marriage/Civil Partnership<br/>Pregnancy / Maternity<br/>Care experience<br/>(where relevant)</b> | This policy will be communicated to all SQA staff to make them aware of the usage of CCTV systems within SQA buildings as well as their rights regarding access to images which would constitute their personal data. The policy also sets out the means by which they can complain about use of the CCTV system. |
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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                      | <p data-bbox="483 580 2029 683">Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p data-bbox="483 719 2029 821">The purpose of SQA's CCTV system is (i) to provide a safe and secure working environment for employees, other workers, and visitors to SQA premises, and (ii) for the detection and prevention of crime to protect SQA staff, property and equipment</p> <p data-bbox="483 874 2029 976">This policy sets out the purposes for which the CCTV system and the images captured by it can be used, to ensure that images are not misused. No specific group can be targeted by the CCTV system or by its users because it is a static system. Cameras are fixed and cannot be used to zoom in on or follow an individual around.</p> <p data-bbox="483 1029 2029 1193">Cameras are equipped with motion detection and record digital images. Cameras record any movement detected in the area under surveillance together with the time, date and location of the movement. All cameras operate 24 hours a day, all year round. The image quality allows identification of individuals in the area of coverage. Cameras record images continuously, but the recorded images will be viewed only where required for the purposes described above or to respond to a request for information.</p> <p data-bbox="483 1246 2029 1348">This policy and associated use of the CCTV system apply equally to all equality groups. Feedback from the network groups suggests that the use of CCTV reduces the fear of crime so has a positive impact on all protected characteristics.</p> |

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|  | <p>The training provided to users of the CCTV system will be reviewed to ensure that it reflects this policy and makes clear their responsibilities.</p> <p>Signage making individuals aware of the CCTV system in both SQA locations will be reviewed to ensure that this is visible and readable for all user groups.</p> <p style="text-align: center;">Advance equality of opportunity</p> <p style="text-align: center;">Foster good relations</p> <p>A documented CCTV policy made available to all staff and others working for SQA demonstrates SQA's commitment to balancing the use of CCTV to assist with providing a secure working environment without being unnecessarily intrusive.</p>   |
| <p><b>Protected Characteristic</b></p> | <p><b>General Equality Duty</b></p>  |
| <p><b>Disability</b></p>               | <p style="text-align: center;">Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The purpose of SQA's CCTV system is (i) to provide a safe and secure working environment for employees, other workers, and visitors to SQA premises, and (ii) for the detection and prevention of crime to protect SQA staff, property and equipment</p> <p>This policy sets out the purposes for which the CCTV system and the images captured by it can be used, to ensure that images are not misused. No specific group can be targeted by the CCTV system or by its users because it is a static system. Cameras are fixed and cannot be used to zoom in on or follow an individual around.</p> <p>Cameras are equipped with motion detection and record digital images. Cameras record any movement detected in the area under surveillance together with the time, date and location of the movement. All cameras operate 24 hours a day, all year round. The image quality allows identification of individuals in the area of coverage. Cameras record images continuously, but the recorded images will be viewed only where required for the purposes described above or to respond to a request for information.</p> |

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|  | <p>Advance equality of opportunity</p>   |
|  | <p>Foster good relations</p>   |
|  | <p>A documented CCTV policy made available to all staff and others working for SQA demonstrates SQA's commitment to balancing the use of CCTV to assist with providing a secure working environment without being unnecessarily intrusive.</p>   |
| <p><b>Protected Characteristic</b></p> | <p><b>General Equality Duty</b></p>  |
| <p><b>Race</b></p>                     | <p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The purpose of SQA's CCTV system is (i) to provide a safe and secure working environment for employees, other workers, and visitors to SQA premises, and (ii) for the detection and prevention of crime to protect SQA staff, property and equipment</p> <p>This policy sets out the purposes for which the CCTV system and the images captured by it can be used, to ensure that images are not misused. No specific group can be targeted by the CCTV system or by its users because it is a static system. Cameras are fixed and cannot be used to zoom in on or follow an individual around.</p> |



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|                                 | Advance equality of opportunity  |
|                                 |  |
|                                 | Foster good relations  |
|                                 | A documented CCTV policy made available to all staff and others working for SQA demonstrates SQA's commitment to balancing the use of CCTV to assist with providing a secure working environment without being unnecessarily intrusive.  |
| <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  |

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The format/content of the policy document has been reviewed and amended for accessibility.

**Advance equality of opportunity**

n/a

**Foster good relations**

A documented CCTV policy made available to all staff and others working for SQA demonstrates SQA's commitment to balancing the use of CCTV to assist with providing a secure working environment without being unnecessarily intrusive.

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| <b>Protected Characteristic</b> | <b>General Equality Duty</b>  |
| <b>Sex</b>                      | <p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The purpose of SQA's CCTV system is (i) to provide a safe and secure working environment for employees, other workers, and visitors to SQA premises, and (ii) for the detection and prevention of crime to protect SQA staff, property and equipment</p> <p>This policy sets out the purposes for which the CCTV system and the images captured by it can be used, to ensure that images are not misused. No specific group can be targeted by the CCTV system or by its users because it is a static system. Cameras are fixed and cannot be used to zoom in on or follow an individual around.</p> <p>Cameras are equipped with motion detection and record digital images. Cameras record any movement detected in the area under surveillance together with the time, date and location of the movement. All cameras operate 24 hours a day, all year round. The image quality allows identification of individuals in the area of coverage. Cameras record images continuously, but the recorded images will be viewed only where required for the purposes described above or to respond to a request for information.</p> <p>This policy and associated use of the CCTV system apply equally to all equality groups. Feedback from the network groups suggests that the use of CCTV reduces the fear of crime so has a positive impact on all protected characteristics.</p> <p>The training provided to users of the CCTV system will be reviewed to ensure that it reflects this policy and makes clear their responsibilities.</p> <p>Signage making individuals aware of the CCTV system in both SQA locations will be reviewed to ensure that this is visible and readable for all user groups.</p> |
|                                 | Advance equality of opportunity   |

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| <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   |
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|   | <p>Advance equality of opportunity</p>   |
|   | <p>Foster good relations</p>   |
| <p><b>Protected Characteristic</b></p> <p><b>Marriage/Civil Partnership</b></p> | <p style="text-align: center;"><b>General Equality Duty</b></p> <p style="text-align: center;">Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The purpose of SQA's CCTV system is (i) to provide a safe and secure working environment for employees, other workers, and visitors to SQA premises, and (ii) for the detection and prevention of crime to protect SQA staff, property and equipment</p> <p>This policy sets out the purposes for which the CCTV system and the images captured by it can be used, to ensure that images are not misused. No specific group can be targeted by the CCTV system or by its users because it is a static system. Cameras are fixed and cannot be used to zoom in on or follow an individual around.</p> |

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|                                 | Advance equality of opportunity  |
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| <b>Protected Characteristic</b> | <b>General Equality Duty</b>   |
| <b>Pregnancy / Maternity</b>    | <p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The purpose of SQA's CCTV system is (i) to provide a safe and secure working environment for employees, other workers, and visitors to SQA premises, and (ii) for the detection and prevention of crime to protect SQA staff, property and equipment</p>   |

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|                          | <b>General Equality Duty</b>   |
| <b>Considered by SQA</b> |  |
| <b>Care experience</b>   | Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010  |



**(where relevant)**

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**Advance equality of opportunity**

**Foster good relations**

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**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 unjustified negative impacts have been identified.