

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 monitor the implementation of policy and the impact on equality groups (evidence and consultation)			[ONGOING RECORD]
Review date for the policy	Director of FCS Head of SPG	Commencing June 2026	

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
[LIST]	[CROSS REFERENCE]			
Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.	Eliminate unlawful Discrimination	Director of FCS Head of SPG	Ongoing	

Policy Aims

Name of Policy or practice	Addressing Financial Irregularity
New Policy or Revision	Revision
Name of Policy Owner	Director of Finance & Corporate Services
Date Policy Owner Confirmed Completion	March 3 2023

What is the rationale for this policy or practice?
<p>The Scottish Public Finance Manual requires Scottish public bodies to “develop a fraud policy statement in order to communicate their approach to fraud.” This policy represents SQA’s approach to meeting that requirement. It is designed to provide clarity for all staff as to where responsibilities lie in relation to prevention of fraud and whenever instances of fraud are discovered.</p> <p>The Addressing Financial Irregularity policy is in place to set out what staff must do in the event that there is suspicion that a financial irregularity or fraud may have occurred. This is to protect SQA’s financial interests, and reputation from fraud in any of its operations.</p>
What evidence is there to support the implementation or development of this policy or practice?
<p>The Addressing Financial Irregularities exists to protect SQA’s (and the Scottish taxpayer’s) interests to ensure that any financial irregularities or fraud are caught early and handled appropriately and sensitively.</p> <p>Financial irregularity might be described as fraud, embezzlement, or deception; all these terms relate to an attempt to gain a practical result because of a false pretence. An example would be using the identity of an individual or an organisation without their permission to obtain credit or goods. The practical result must be caused by the false pretence. This kind of conduct is a crime in Scotland, and is defined by SQA as “the deliberate use of deception or dishonesty to disadvantage or cause loss (usually, but not always, financial) to another person or party”.</p> <p>SQA is in receipt of substantial amounts of public money. SQA has robust and appropriate processes for handling, managing, and auditing these funds and SQA’s value of trust is embedded within these processes. Evidence suggests that those working in environments similar to SQA are more likely to be at risk of fraud than other occupations. E.g., “Individuals in managerial and professional occupations were more likely to be a victim of fraud (8.0%) than individuals in routine or manual occupations (5.3%), full-time students (4.4%) and those who have never worked or are in long term unemployment (3.8%).” – Overview of fraud statistics - Office for National Statistics (ons.gov.uk)</p>

What are the aims of this policy or practice?

SQA has a responsibility to ensure it has the safeguards and contingencies in place to protect public money, as detailed above. These responsibilities are detailed in the Addressing Financial Irregularity policy, which sets out a clear understanding of what constitutes financial irregularity and what staff should do if there is a suspicion that this expectation of trust has not been fulfilled and financial irregularities may have occurred. This is to protect SQA's financial interests and reputation from fraud in any of its operations.

The Scottish Public Finance Manual requires Scottish public bodies to “develop a fraud policy statement in order to communicate their approach to fraud” – this policy is how SQA meets this requirement. It is designed to provide clarity for all staff as to where responsibilities lie in relation to prevention of fraud and whenever instances of fraud are discovered.

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

This policy applies to all SQA staff and SQA's appointees and sets out SQA's expectations with regards to employees' conduct and approach to financial irregularity. SQA acknowledges that staff and appointees will be represented by a number of the protected characteristics. This will require consideration of each equality group as a person potentially implicated in activities relating to financial irregularity.

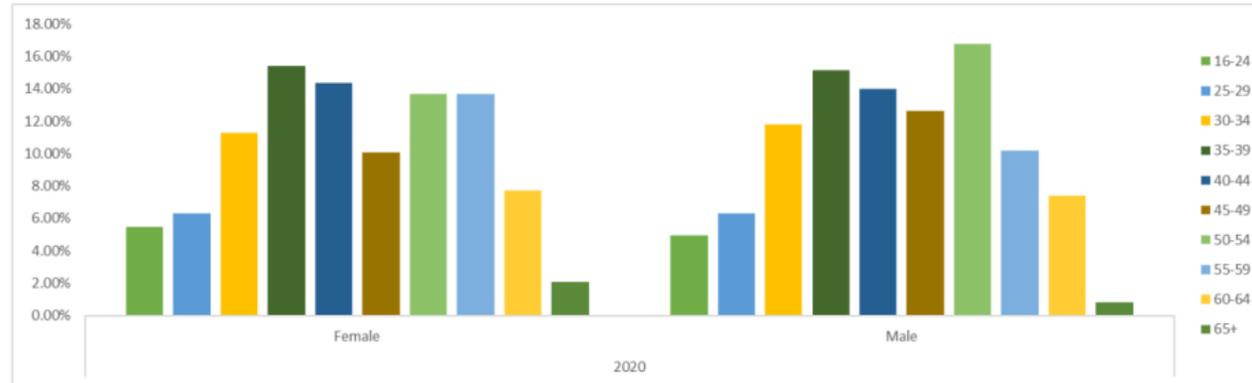
Evidence, Consultation and Engagement

What stakeholders have you engaged with in the development of this policy or practice?
<p>The policy reports into the SQA Audit Committee where issues of risk, control, governance, and associated assurance are reported upon. The Audit Committee therefore has a general responsibility for monitoring the operation and effectiveness of SQA’s management of financial irregularity arrangements and should receive appropriate reports on such activity.</p> <p>The approaches to fraud response and prevention have been subject to internal and external audit scrutiny. An annual fraud report is provided to SQA’s Audit Committee.</p> <p>The policy was extensively reviewed by legal experts (Broodies).</p>

	What evidence about equality groups do you have to support this assessment?
Age	<p><u>External Evidence</u></p> <p>Relates to Corruption and Anti Bribery policy: Fraud victimisation was identified as being higher in the middle of the age distribution, where adults aged 45-54 were more likely to be a victim of fraud (7.9%) than 16-24 year olds (5.0%) or those aged 75+ (4.0%). This differs from violent crime and most property crime types where younger age groups were generally most likely to be victims. –Overview of fraud statistics - Office for National Statistics (ons.gov.uk), Section 3</p> <p>Bribery and Anti-Corruption: adults aged 75 years and over were less likely to be a victim of fraud (5.8%) than all other age groups, except for adults aged 18 to 24 years and adults aged 35 to 44 years (Appendix table 7); they were also less likely to be victims of computer misuse (1.5%) than those aged 35 to 74 years – Nature of fraud and computer misuse in England and Wales - Office for National Statistics (ons.gov.uk), Section 4.</p> <p>SQA has a wide and varied workforce in this regard, as detailed in the graphic below. The majority of SQA employees are in the mid-range age bandings. A total of 79% workers are aged between 30 – 59, thus overlapping with the age-range detailed above that is at higher risk of being victims of fraud. Less than 2% of SQA employees are aged 60+ and the SQA has recently</p>

seen a decrease in younger (under 35) employees.

Colleagues by age band and gender (sex) 2020 (as in Table 1.05)



This information can be found at table 1.05 here: [workforce-equality-monitoring-report-2019-2021.pdf \(sqa.org.uk\)](https://www.sqa.org.uk/workforce-equality-monitoring-report-2019-2021.pdf)

Disability

External evidence

Adults with a disability are more likely to be a victim of fraud (9.1%) than those without a disability (7.4%), with the Office of National Statistics reporting that in the last 5 years almost 1 in 4 (23.1%) disabled adults aged 16 years and over experienced crime including fraud and computer misuse, compared with 1 in 5 (20.7%) non-disabled adults.

Source - [Nature of fraud and computer misuse in England and Wales - Office for National Statistics \(ons.gov.uk\);](https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandvictimisation/articles/natureoffraudandcomputermisuseinenglandandwales/2019)
<https://bit.ly/3y15PU8>

SQA's staff is diverse, including staff with disabilities, who are more likely to be a victim of fraud. 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 highest proportion of colleagues who have declared a disability (53%) falls within the lowest age bands (16 – 44) and second highest (47%) within the upper age bands (45–64)</p> <p>A total of 55% of disabled employees are female and 45% are male. 63% of colleagues who have declared a disability are within the Grade range 06 to HOS. HOS has the largest percentage of colleagues declaring a disability (13%) whereas Grade 6 has the largest overall number of colleagues declaring a disability at 23%.</p> <p>Source: SQA Workforce Equality Monitoring Report 2019 – 2021</p>
<p>Race</p>	<p><u>External evidence:</u></p> <p>Racial discrimination in fraud cases is a recorded finding, with a Cambridge University study reporting figures that demonstrate black victims of fraud are more than twice as likely to be denied a refund by their bank as white customers, with exploration of this finding suggesting that those from ethnic minorities are less likely to be believed. For the purposes of the policy in question, this is an important consideration in terms of awareness of biases and prejudices for the general population that may risk making decisions about fraud that are based on unconscious biases and stereotypes.</p> <p>Source: https://www.thetimes.co.uk/article/banks-biased-against-black-fraud-victims-237z7rxvm</p> <p>Further to this, the UK Government’s paper, Ethnic Minority Businesses and Access to Finance, details the British Bankers’ Association commitment to ethnic minority businesses to ensure equal access to finance and future actions to recognise the difficulties that ethnic minority businesses and would-be entrepreneurs were reporting in accessing business loans.</p> <p>Source: https://www.gov.uk/government/publications/ethnic-minority-businesses-and-access-to-finance.</p> <p>At SQA, staff breakdowns for race are recorded and reported. For this policy, an awareness for staff assessing fraud and other financial irregularity cases is required to ensure that biases, conscious or unconscious, are not present when making decisions about financial irregularities.</p> <p>The table below (Source: workforce-equality-monitoring-report-2019-2021.pdf (sqa.org.uk)) demonstrates the breakdown of staff as recorded in 2019 and 2020. Currently only 3% of SQA employees declared themselves as Minority Ethnicity against a national (Scotland) average of 5.</p>

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%
Total	100.00%	100.00%	

Colleagues by Race (as in table 1.12)



In terms of assessing financial irregularities, the Fraud Response Group will require to be cognisant of the small percentage of SQA staff who have declared themselves to be in an ethnic minority category. This is to mitigate against potential biases in investigation measures and practices, which are often bespoke to the case and not routine, and in decision-making, as detailed above.

Religion or Belief

At SQA, staff breakdowns for religion or belief are recorded and reported. *Christian* and *No Religion* account for nearly 60% of all responses.

Religion or Belief	2019	2020	Variance
Christian	20.69%	29.82%	9.13%
Non-Christian	11.47%	17.28%	5.81%
None	20.69%	29.29%	8.61%
Prefer not to say	3.75%	10.33%	6.58%
Not Provided	43.41%	13.28%	-30.13%
Total	100.00%	100.00%	

As with race, religion / beliefs could be an important consideration in terms of awareness of biases and prejudices for the general population that may risk making decisions about fraud that are based on unconscious biases and stereotypes. To demonstrate, the Pew Research in 2021 found a perceived increase in antisemitic views with repetition of antisemitic tropes relating to financial dealings. An awareness of prejudices that can impact assessments/investigations and decision-making is required.

Source: <https://www.pewresearch.org/religion/2021/05/11/anti-semitism-and-jewish-views-on-discrimination/>.

Sex

In 2021, the Ministry of Justice reported that the offence groups with the highest proportion of females prosecuted were

- non-motoring (34% of 236,000)
- fraud offences (26% of 4,000)
- theft offences (20% of 38,700)
- violence against the person (18% of 48,900)
- summary motoring (18% of 536,000).

Fraud was the offence group with the second highest female proportion of prosecutions (26%), however, benefit fraud was the only specific offence within the group to have a higher proportion of prosecutions for females compared to males (58% of 231). Fraud by false representation: cheque, plastic card, and online bank accounts, was the highest contributing offence within the group, accounting for 60% of female prosecutions for fraud offences, compared to 72% for males.

Females received a suspended sentence most commonly, accounting for 37% of sentences given to females for fraud offences, compared to 30% for males. Males, on the other hand, received total immediate custody most frequently, accounting for 32% of sentences for males for fraud offences, compared to 21% for females.

Source: <https://www.gov.uk/government/statistics/women-and-the-criminal-justice-system-2021/women-and-the-criminal-justice-system-2021#:~:text=Males%20maintain%20higher%20risk%20of,were%20male%20and%2030%25%20female.>

At SQA, 62% of staff are female, 38% male. A 60% representation of females across most grades is evident with a decrease to circa 40% for more senior grades.

Grade	Gender (Sex)					
	Female			Male		
	2019	2020	Variance	2019	2020	Variance
1	83.33%	66.67%	-16.67%	16.67%	33.33%	16.67%
3	65.15%	65.00%	-0.15%	34.85%	35.00%	0.15%
4	63.28%	64.71%	1.43%	36.72%	35.29%	-1.43%
5	58.02%	61.54%	3.51%	41.98%	38.46%	-3.51%
6	69.90%	69.90%		30.10%	30.10%	
7	59.76%	57.89%	-1.86%	40.24%	42.11%	1.86%
8	53.54%	56.34%	2.80%	46.46%	43.66%	-2.80%
HOS	39.39%	40.00%	0.61%	60.61%	60.00%	-0.61%
EMT	57.14%	42.86%		57.14%	42.86%	
Total	61.20%	61.64%	0.44%	38.80%	38.36%	-0.44%

Source: SQA Workforce Equality Monitoring Report 2019-2021

https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf

Sexual Orientation

Sexual Orientation	2019	2020	Variance
Bisexual	0.96%	1.26%	0.30%
Gay man	1.39%	2.11%	0.71%
Gay woman / Lesbian	0.96%	1.05%	0.09%
Heterosexual/straight	46.20%	70.60%	24.41%
In another way	0.11%	0.21%	0.10%
Not sure	0.11%	0.11%	0.00%
Prefer not to say	2.79%	8.01%	5.22%
Not Provided	47.48%	16.65%	-30.83%
Total	100.00%	100.00%	

Source: <workforce-equality-monitoring-report-2019-2021.pdf> (sqa.org.uk)

Gender Re-assignment (Gender identity and transgender)	SQA doesn't currently report gender reassignment data, as doing so may risk identifying individual respondents due to a small number of people responding in a certain way.																										
Marriage/Civil Partnership	<p>Table 1.10: Colleagues by relationship status</p> <table border="1" data-bbox="499 379 1429 611"> <thead> <tr> <th>Relationship status</th> <th>2019</th> <th>2020</th> <th>Variance</th> </tr> </thead> <tbody> <tr> <td>Married/Civil Partnership</td> <td>30.01%</td> <td>44.66%</td> <td>14.65%</td> </tr> <tr> <td>Single</td> <td>24.44%</td> <td>35.87%</td> <td>11.44%</td> </tr> <tr> <td>Prefer not to say</td> <td>1.93%</td> <td>5.71%</td> <td>3.79%</td> </tr> <tr> <td>Not Provided</td> <td>43.62%</td> <td>13.76%</td> <td>-29.87%</td> </tr> <tr> <td>Total</td> <td>100.00%</td> <td>100.00%</td> <td></td> </tr> </tbody> </table>			Relationship status	2019	2020	Variance	Married/Civil Partnership	30.01%	44.66%	14.65%	Single	24.44%	35.87%	11.44%	Prefer not to say	1.93%	5.71%	3.79%	Not Provided	43.62%	13.76%	-29.87%	Total	100.00%	100.00%	
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Care experience (where relevant)	SQA does not currently collect Care Experience data. SQA is a Corporate Parent however.																										

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
	Addressing Financial Irregularities: The evidence cited from ONS shows that people aged 40-45 were most likely to be targeted for fraud. For this policy, there is training, communications, and IT systems in place to protect all staff from fraud such as cyber security awareness week that takes place each year and cyber security policies and awareness-raising communications. This is expected to have a disproportionate positive impact on this age group.
	SQA does capture age data in relation to fraud currently. Due to the highly sensitive and litigious nature of each fraud case, this is unlikely to be feasible in future. Awareness-raising exercises will continue to be run by SQA across teams such as the Information Governance Team and the Business Systems directorate (in terms of cyber security awareness).
	Advance equality of opportunity
	Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the 'same chance' to employees of all <i>Ages</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links).
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.

	Foster good relations
	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. With regards to age, a prevalent view is that it disproportionately affects older individuals while the data demonstrates that 70+ years-old individuals are less likely to be a victim of fraud.
	Awareness raising through communications to all staff – fraud victimisation is more likely in the age ranges detailed previously. Continue to develop training for this area in terms of cyber security.
Protected Characteristic	General Equality Duty
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	As detailed previously, adults with a disability are more likely to be a victim of fraud (9.1%) than those without a disability (7.4%), with the Office of National Statistics reporting that in the last 5 years almost 1 in 4 (23.1%) disabled adults aged 16 years and over experienced crime including fraud and computer misuse, compared with 1 in 5 (20.7%) non-disabled adults.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Advance equality of opportunity
	Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the ‘same chance’ to employees of all <i>abilities</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links).
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Foster good relations
	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. With regards to disability, there is a higher risk of being a victim of fraud, as

	previously detailed. By raising awareness of this and creating awareness of risks and what to look out for, staff can be empowered with knowledge.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
Protected Characteristic	General Equality Duty
Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	As stated earlier, biases have been identified in financial dealings, with racial discrimination being found when assessing fraud victimisation. For SQA, awareness for staff assessing fraud and other financial irregularity cases is required to ensure that biases, conscious or unconscious, are not present when making decisions about financial irregularities.
	As previously stated, details such protected characteristic data are difficult and sensitive to capture due to the litigious nature of fraud investigations. The Fraud Response Group, where referrals relating to fraud are made, could benefit from awareness of objectivity, keeping in mind the need to be aware of biases and stereotypes, conscious or unconscious, when assessing each case.
	Advance equality of opportunity
	Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the 'same chance' to employees of all <i>rac</i> es remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group.
	Foster good relations
	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. With regards to race, there is a higher risk of discrimination and stereotyping in relation to fraud, as previously detailed. By raising awareness of this and creating awareness of risks and what to look out for, staff can be empowered with knowledge and decision-makers can be made aware of conscious / unconscious bias.

	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
Protected Characteristic	General Equality Duty
Religion or Belief	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	As with race, religion / beliefs could be an important consideration in terms of awareness of biases and prejudices for the general population that may risk making decisions about fraud that are based on unconscious biases and stereotypes. For SQA, awareness for staff assessing fraud and other financial irregularity cases is required to ensure that biases, conscious or unconscious, are not present when making decisions about financial irregularities.
	As with race, the Fraud Response Group, where referrals relating to fraud are made, could benefit from awareness of objectivity, keeping in mind the need to be aware of biases and stereotypes, conscious or unconscious, when assessing each case.
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	Advance equality of opportunity
	Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the 'same chance' to employees of all <i>religions and beliefs</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group.
	Foster good relations
	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. With regards to religion/beliefs, there is a higher risk of discrimination and stereotyping in relation to fraud, as previously detailed. By raising awareness of this and creating awareness of risks and what to look out for, staff can be empowered with knowledge and decision-makers can be made aware of conscious / unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group
Protected Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

	<p>SQA is predominantly female workforce. In 2021, the Ministry of Justice reported that fraud was the offence group with the second highest female proportion of prosecutions (26%). As with other protected characteristics, details such as gender and sex and any other identifying factors are difficult and sensitive to capture due to the litigious nature of fraud investigations.</p> <p>As with age, continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security while abstaining from collecting identifying data.</p>
	<p>Advance equality of opportunity</p>
	<p>Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i>, whether or not the policy actually promotes / advances the 'same chance' to employees of all sex remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.</p> <p>Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.</p>
	<p>Foster good relations</p>
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Protected Characteristic	<p>General Equality Duty</p>
Sexual Orientation	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>

	SQA collects data for sexual orientation. Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the ‘same chance’ to employees of all sex remains unclear.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group
	Advance equality of opportunity
	Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the ‘same chance’ to employees of all <i>sexual orientation</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Foster good relations
	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. By raising awareness, staff can be empowered with knowledge and decision-makers can be made aware of conscious / unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group
Protected Characteristic	General Equality Duty
Gender Re-assignment (Gender identity and transgender)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	There is no evidence to suggest that this policy may impact directly on people with different <i>Gender identities or those who have undergone Gender Re-assignment</i> and therefore make no further recommendations in this area.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Advance equality of opportunity

	<p>Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i>, whether or not the policy actually promotes / advances the 'same chance' to employees of all <i>gender re-assignment</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.</p> <p>Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.</p>
	Foster good relations
	<p>Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. By raising awareness, staff can be empowered with knowledge and decision-makers can be made aware of conscious / unconscious bias.</p> <p>Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group</p>
Protected Characteristic	General Equality Duty
Marriage/Civil Partnership	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>There is no evidence to suggest that this policy may impact directly on people who are <i>married/in civil partnerships</i> and therefore make no further recommendations in this area.</p> <p>Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.</p>
	Advance equality of opportunity
	<p>Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i>, whether or not the policy actually promotes / advances the 'same chance' to employees of all <i>married/in civil partnerships</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.</p> <p>Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.</p>
	Foster good relations

	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. By raising awareness, staff can be empowered with knowledge and decision-makers can be made aware of conscious / unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group
Protected Characteristic	General Equality Duty
Pregnancy / Maternity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	There is no evidence to suggest that this policy may impact directly on people who are <i>pregnant/on maternity leave</i> and therefore make no further recommendations in this area.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Advance equality of opportunity
	Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the 'same chance' to employees who are <i>pregnant/on maternity leave</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Foster good relations
	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. By raising awareness, staff can be empowered with knowledge and decision-makers can be made aware of conscious / unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group
Considered by SQA	General Equality Duty
Care experience	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

(where relevant)	
	There is no evidence to suggest that this policy may impact directly on people who have <i>care experience</i> and therefore make no further recommendations in this area.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Advance equality of opportunity
	Whilst all SQA employees are subjected to the <i>Financial Irregularities Policy</i> , whether or not the policy actually promotes / advances the 'same chance' to employees who have <i>care experience</i> remains unclear. Awareness of risks in financial transactions and dealings at a corporate level will be of benefit to staff in terms of knowledge regarding safeguarding practices (e.g., avoiding phishing scams by not clicking on unfamiliar links), and an awareness of fraud via communications (ongoing) and training can incorporate awareness of unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security.
	Foster good relations
	Fostering good relations involves tackling prejudice and promoting understanding between people who share, or may not share, a protected characteristic. By raising awareness, staff can be empowered with knowledge and decision-makers can be made aware of conscious / unconscious bias.
	Continue to raise awareness of financial irregularity and continue to develop training for this area in terms of cyber security. Consider unconscious bias training for the Fraud Response Group

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