

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	By September 2024	Additional Schedule Review Date	By September 2023
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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.

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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 and assess monthly establishment management information packs containing fundamental employment data on SQA employees	People Analytics, Governance & Systems Manager	Commencing monthly from October 2022	
Review on a quarterly basis of employment law, case law and legislative changes, and equalities updates (including reviewing EHRC website).	HR Shared Services Manager	Commencing quarterly from January 2023	
Review and assess feedback on a quarterly basis from joint trade unions (Unite and Unison) through SQA's Joint engagement forum and Policy review group.	HR Shared Services Manager	Commencing quarterly from January 2023	
Review and assess feedback on a quarterly basis from each of SQA's staff community network groups	HR Shared Services Manager	Commencing quarterly from January 2023	
Continue to review and assess on an annual basis SQA's engagement People survey	OD Manager	Commencing annually from October 2023	
Review and assess on an annual basis all SQA employee lifecycle data	People Analytics, Governance & Systems Manager	Commencing annually from January 2024	

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Continue to review and assess every 2 years SQA's equality mainstreaming report [next report due May 2023]	People Reward and Equalities Manager	Commencing every 2 years from May 2023	
Continue to review and assess every 2 years SQA's workforce equality monitoring report [next report due May 2023]	People Reward and Equalities Manager	Commencing every 2 years from May 2023	

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
[LIST]	[CROSS REFERENCE]			
The Code of Conduct refers to and is closely tied with the Dignity at Work Policy. There is a recommendation that the Code explicitly refers out to the Dignity at Work Policy in order to give employees further guidance on their responsibilities regarding equalities	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010	Head of HR	By September 2024	
It is recommended that all employees are given regular equalities update training to ensure they understand their responsibilities under the Code of Conduct.	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010	Head of Strategic Planning & Governance	By September 2024	

Policy Aims

Name of Policy or practice	Code of Conduct
New Policy or Revision	Revision
Name of Policy Owner	Head of Human Resources
Date Policy Owner Confirmed Completion	21/06/2022

What is the rationale for this policy or practice?
<p>Scottish Qualifications Authority (SQA) and all employees of SQA must demonstrate high standards of corporate and personal conduct. This can be achieved by embracing and maintaining our core values, which are: <i>Trusted, Progressive, and Enabling</i>.</p> <p>This policy document sets out the code of conduct for all employees of SQA, i.e. the standards of conduct that are expected of SQA employees.</p> <p>The Code of Conduct is to help every employee to make the right decisions about their conduct and behaviour every day. While it sets the general policy and guidance and highlights a benchmark for exemplary ethical behaviour, it does not cover every potential situation. The code of conduct states that should an employee experience any situations not covered by this policy, they should speak to their line manager.</p> <p>In summary, the purpose of the Code of Conduct is to summarise the standard of conduct and behaviour we expect at SQA.</p>
What evidence is there to support the implementation or development of this policy or practice?
<p>There is an insignificant data sample relating to those who have contravened the standards laid out in this policy to suggest any negative impacts on SQA employees.</p> <p>Our SQA People survey (October 2021) does provide evidence that this policy can have a positive impact on or employees. The data overleaf highlights the measurements from the People Survey that relates to this policy, although the scores are positive, we have had 4% of employees that advised they been bullied or harassed in the workplace in the last 12 months which highlights the need to continue with this policy.</p> <p>(A reminder that in addition to our <i>Dignity at Work</i> policy, the <i>Code of Conduct Policy</i> also references discrimination and harassment – particularly in respect of out of work events and activities.)</p>

It is also very important to note that the numbers of employees who were disciplined for contravening the standards laid out in this policy in SQA in the last twelve months. We therefore conclude (i) This data sample is very insignificant (ii) It is practically impossible to draw any meaningful conclusions in respect of Equality impact.

Whilst this EqIA has identified some potential (in some cases hypothetical) impacts, there is little evidence either nationally or locally within SQA to specifically support some of the findings of this assessment.

There is some evidence available with regards to Section 6.11 of the Code of Conduct “Equality and Diversity and Inclusion” which is drawn from the 2021 SQA People Survey.

Extracts from SQA 2021 People Survey, inclusion, and fair treatment score average 94%:

Question	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	% Positive
I am treated fairly at work	44%	45%	6%	3%	2%	89%
I am treated with respect by the people I work with	46%	44%	6%	3%	1%	90%
I feel valued for the work I do	34%	40%	14%	9%	4%	73%
I think that SQA respects individual differences	38%	46%	11%	3%	2%	84%
SQA is committed to creating a diverse and inclusive workplace	26%	54%	16%	2%	2%	79%
managers in SQA actively role model the behaviours set out in the SQA leadership statement	17%	44%	32%	6%	2%	61%
have you been discriminated against at work in the past 12 months		4% Yes			91% No	

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have you been bullied harassed at work in the past 12 months		4% Yes			91% No	
did you report your experience of bullying or harassment		50% Yes			44% No	
what is appropriate action taken to address their behaviour you experienced		6% yes			82% no	

It should be noted that currently the People Survey does not gather equality data and the rationale for this is to protect the anonymity of respondents. This decision was made in conjunction with the Unions (Unite and Unison) in 2012.

What are the aims of this policy or practice?

This policy sets out the code of conduct for all employees of SQA i.e. the standards of conduct that are expected of SQA employees.

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

The *Code of Conduct* policy sets out SQA's expectations with regards to employees' conduct both internally and externally. It articulates the organisational approach to harassment, bullying and other unacceptable behaviours that could impact on all those in the protected characteristic groups.

Evidence, Consultation and Engagement

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

This policy has been developed in consultation with SQA's recognised Trades Unions, Unite and Unison, who represent all staff throughout the organisation.

In addition, as this is an internal policy, SQA has only consulted with internal groups. These include:

- ACE (Appreciate Culture and Ethnicity) Network.
- SQA Disability Network.
- MAC (Make A Change Group).
- Mental Health First Aiders Forum.
- SQA Rainbow Network.
- Women's Network.
- Parent & Carers Network.

The table below details the evidence of staff network consultation meetings.

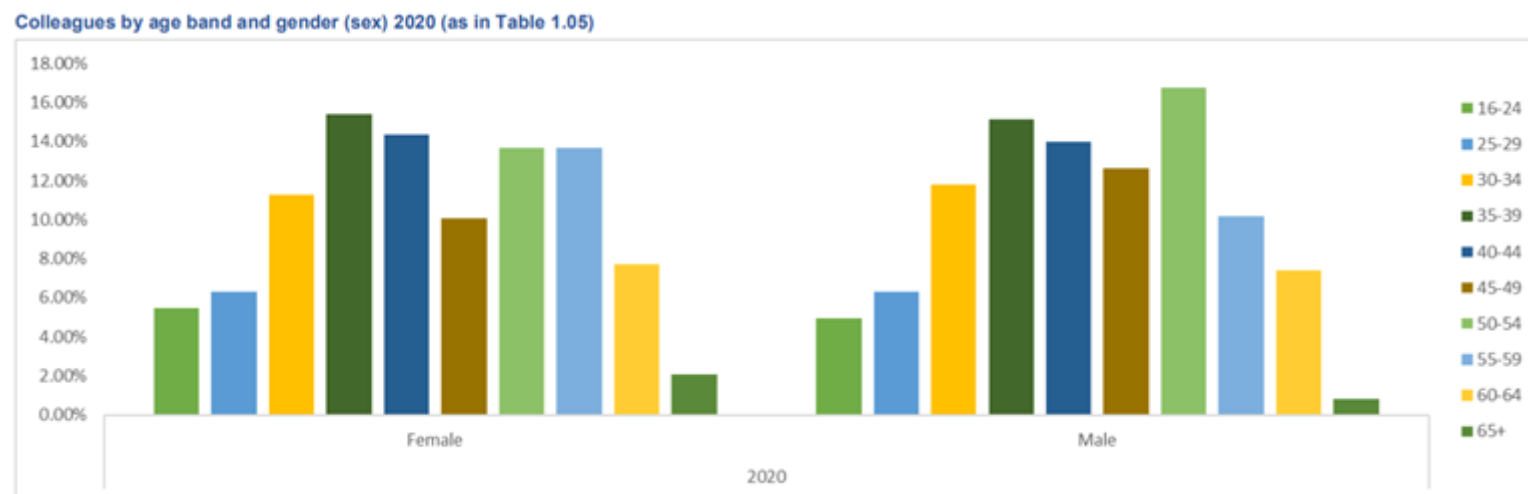
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Evidence of Staff Network Consultation Meetings:

Policy-Name	Review-Date	Women's- Network	(ACE)	Disability-Network	Rainbow-Network
Redeployment	02/08/2021	Yes	Yes	Yes	Yes
Restructure	02/08/2021	Yes	☐	Yes	☐
Standby-&-Call-Out	23/06/2021	☐	Yes	Yes	Yes
Time-Recording	09/08/2021	Yes	Yes	Yes	Yes
Attendance-Management	16/08/2021	Yes	☐	Yes	Yes
Childcare-Voucher	16/08/2021	Yes	☐	Yes	Yes
Dignity-at-Work	10/08/2021	Yes	Yes	Yes	Yes
Disciplinary	01/06/2021	Yes	Yes	Yes	Yes
Equalities,-Diversity-&-Inclusion	23/08/2021	Yes	Yes	Yes	Yes
Fixed-Term-Workers	23/08/2021	Yes	☐	Yes	Yes
Grievance	29/06/2021	Yes	Yes	Yes	Yes
Improving-Performance	07/09/2021	Yes	Yes	Yes	Yes
Probation	06/09/2021	Yes	Yes	Yes	Yes
Recruitment-&-Selection	06/05/2021	Yes	Yes	Yes	Yes
Secondment	13/09/2021	Yes	Yes	Yes	Yes
Whistleblowing	22/07/2021	Yes	Yes	Yes	Yes
Flexible-Working	18/11/2021	Yes	☐	Yes	Yes
Flexitime	26/10/2021	Yes	Yes	Yes	Yes
Pay	09/12/2021	Yes	Yes	Yes	Yes
TOIL	16/12/2021	Yes	Yes	Yes	Yes
Code-of-Conduct	24/02/2022	Yes	Yes	Yes	Yes
Conflict-of-Interest	10/03/2022	Yes	Yes	Yes	Yes
Pensions-Discretion	29/03/2022	Yes	☐	Yes	Yes
Redundancy	22/03/2022	Yes	☐	Yes	Yes
Relocation	31/03/2022	Yes	☐	Yes	Yes
Retirement	15/03/2022	Yes	Yes	Yes	Yes

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

Age



The above table shows colleagues by age band and gender as of 2020. This table 1.05 is available to view on SQA workforce equality monitoring report 2019-2020 https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf

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.

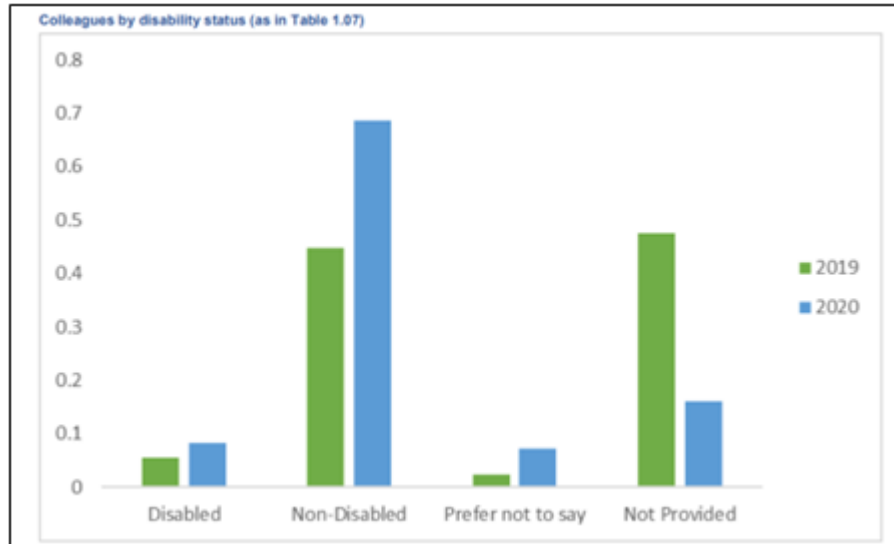
Comparisons between 2019 and 2020 data show that the greatest increase in the proportion of female colleagues is within the 60–64 age band - an increase of 12 colleagues.

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.

Source: SQA Workforce Equality Monitoring Report 2019 - 2021

Disability

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 (approx. half of employees) to a much reduced 23.1 % in 2020.

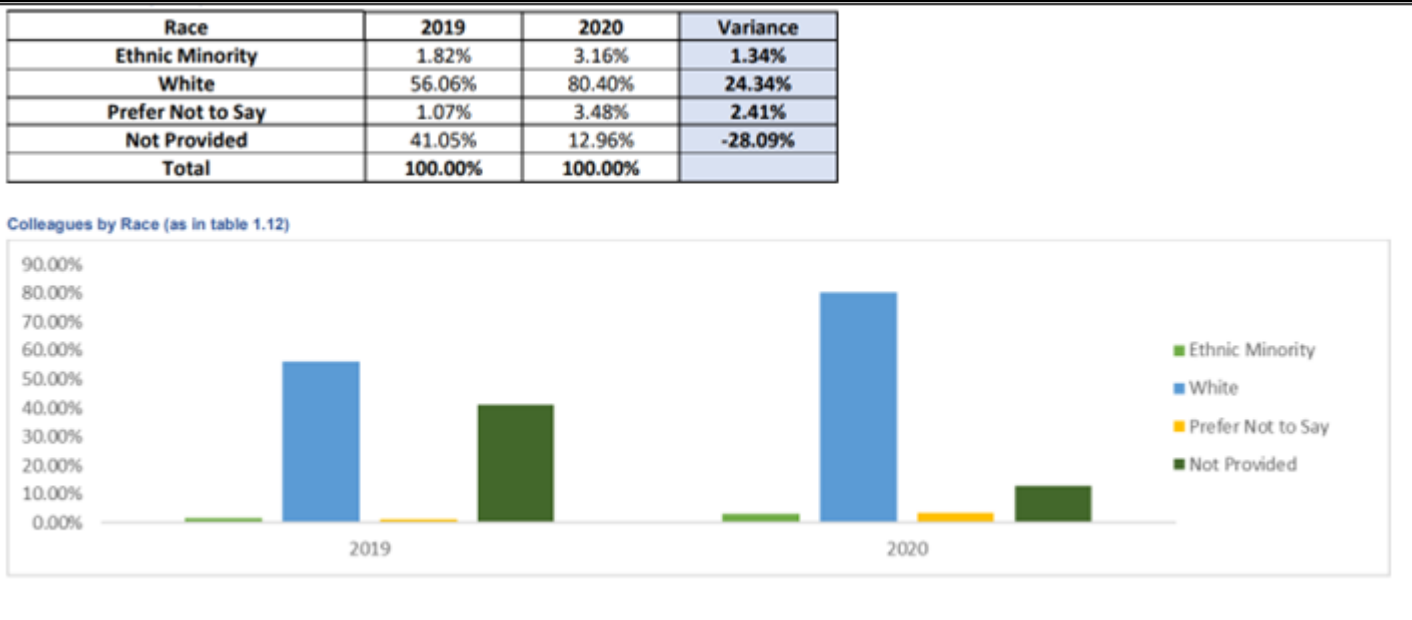


The above table shows colleagues by Disability status. This table 1.07 available to view on SQA workforce equality monitoring report 2019-2020 https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf

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)

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 Head of Service. Head of Service 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%.

Race



The above table shows colleagues by Race. This table 1.12 is available to view on SQA workforce equality monitoring report 2019-2020 https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf

Currently only 3% of SQA employees declared themselves as Minority Ethnicity against a national (Scotland) average of 5%.

A further breakdown of ethnicity (overleaf) indicates that *Chinese, Indian and Mixed Ethnicity* groups are currently the predominant minority ethnicities in the SQA.

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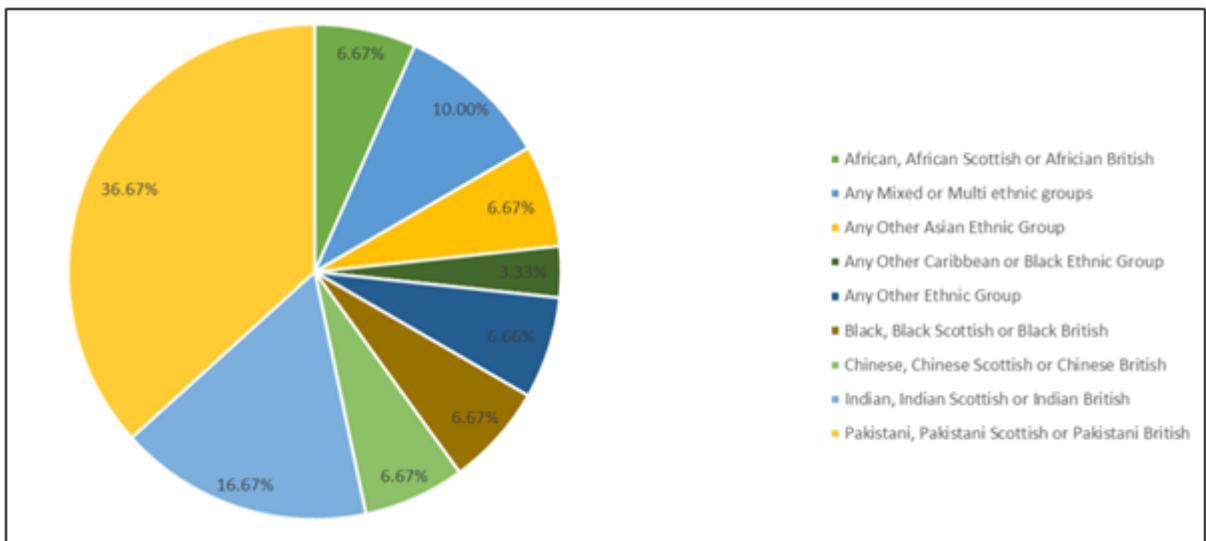


Table 1.15 Race: Colleagues by black and minority ethnicities

Black and Minority Ethnicities	2019	2020	Variance
African, African Scottish or African British	5.88%	6.67%	0.78%
Any Mixed or Multi ethnic groups	11.76%	10.00%	-1.76%
Any Other Asian Ethnic Group	5.88%	6.67%	0.78%
Any Other Caribbean or Black Ethnic Group		3.33%	3.33%
Any Other Ethnic Group		6.66%	6.66%
Black, Black Scottish or Black British	5.88%	6.67%	0.78%
Chinese, Chinese Scottish or Chinese British	11.76%	6.67%	-5.10%
Indian, Indian Scottish or Indian British	17.65%	16.67%	-0.98%
Pakistani, Pakistani Scottish or Pakistani British	41.18%	36.67%	-4.51%
Total	100.00%	100.00%	

The above tables show colleagues by Race. This table 1.15 is available to view on SQA workforce equality monitoring report 2019-2020 https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf

Religion or Belief	<table border="1"> <thead> <tr> <th>Religion or Belief</th> <th>2019</th> <th>2020</th> <th>Variance</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>20.69%</td> <td>29.82%</td> <td>9.13%</td> </tr> <tr> <td>Non-Christian</td> <td>11.47%</td> <td>17.28%</td> <td>5.81%</td> </tr> <tr> <td>None</td> <td>20.69%</td> <td>29.29%</td> <td>8.61%</td> </tr> <tr> <td>Prefer not to say</td> <td>3.75%</td> <td>10.33%</td> <td>6.58%</td> </tr> <tr> <td>Not Provided</td> <td>43.41%</td> <td>13.28%</td> <td>-30.13%</td> </tr> <tr> <td>Total</td> <td>100.00%</td> <td>100.00%</td> <td></td> </tr> </tbody> </table>	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%																																																														
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Sex	<table border="1"> <thead> <tr> <th rowspan="3">Grade</th> <th colspan="6">Gender (Sex)</th> </tr> <tr> <th colspan="3">Female</th> <th colspan="3">Male</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>Variance</th> <th>2019</th> <th>2020</th> <th>Variance</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>83.33%</td> <td>66.67%</td> <td>-16.67%</td> <td>16.67%</td> <td>33.33%</td> <td>16.67%</td> </tr> <tr> <td>3</td> <td>65.15%</td> <td>65.00%</td> <td>-0.15%</td> <td>34.85%</td> <td>35.00%</td> <td>0.15%</td> </tr> <tr> <td>4</td> <td>63.28%</td> <td>64.71%</td> <td>1.43%</td> <td>36.72%</td> <td>35.29%</td> <td>-1.43%</td> </tr> <tr> <td>5</td> <td>58.02%</td> <td>61.54%</td> <td>3.51%</td> <td>41.98%</td> <td>38.46%</td> <td>-3.51%</td> </tr> <tr> <td>6</td> <td>69.90%</td> <td>69.90%</td> <td></td> <td>30.10%</td> <td>30.10%</td> <td></td> </tr> <tr> <td>7</td> <td>59.76%</td> <td>57.89%</td> <td>-1.86%</td> <td>40.24%</td> <td>42.11%</td> <td>1.86%</td> </tr> <tr> <td>8</td> <td>53.54%</td> <td>56.34%</td> <td>2.80%</td> <td>46.46%</td> <td>43.66%</td> <td>-2.80%</td> </tr> <tr> <td>HOS</td> <td>39.39%</td> <td>40.00%</td> <td>0.61%</td> <td>60.61%</td> <td>60.00%</td> <td>-0.61%</td> </tr> <tr> <td>EMT</td> <td>57.14%</td> <td>42.86%</td> <td></td> <td>57.14%</td> <td>42.86%</td> <td></td> </tr> <tr> <td>Total</td> <td>61.20%</td> <td>61.64%</td> <td>0.44%</td> <td>38.80%</td> <td>38.36%</td> <td>-0.44%</td> </tr> </tbody> </table>	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%
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<p>The above table shows colleagues by sex and grade. This table 1.02 is available to view on SQA workforce equality monitoring report 2019-2020 https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</p> <p>A greater number of SQA employees overall are female - 62% female versus 38% male. A 60% representation of females across most grades is evident with a decrease to circa 40% for more senior grades.</p>																																																																																										

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%	

The above table shows colleagues by sexual orientation. This table is available to view on SQA workforce equality monitoring report 2019-2020 https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf

Source: SQA Workforce Equality Monitoring Report 2019 – 2021

Gender Re-assignment (Gender identity and transgender)	No equality profiling data is currently captured by the SQA.																				
Marriage/Civil Partnership	No equality profiling data is currently captured by the SQA.																				
Pregnancy / Maternity	<table border="1" data-bbox="506 400 1435 624"> <thead> <tr> <th></th> <th colspan="3">Colleagues</th> </tr> <tr> <th>Pregnancy Status</th> <th>2019</th> <th>2020</th> <th>Variance</th> </tr> </thead> <tbody> <tr> <td>Not Pregnant</td> <td>98.25%</td> <td>98.95%</td> <td>0.70%</td> </tr> <tr> <td>Pregnant</td> <td>1.75%</td> <td>1.05%</td> <td>-0.70%</td> </tr> <tr> <td>Total</td> <td>100.00%</td> <td>100.00%</td> <td></td> </tr> </tbody> </table> <p data-bbox="488 675 2024 740">The above table shows colleagues by pregnancy status. This table 1.20 is available to view on SQA workforce equality monitoring report 2019-2020 https://www.sqa.org.uk/sqa/files_ccc/workforce-equality-monitoring-report-2019-2021.pdf</p>		Colleagues			Pregnancy Status	2019	2020	Variance	Not Pregnant	98.25%	98.95%	0.70%	Pregnant	1.75%	1.05%	-0.70%	Total	100.00%	100.00%	
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Care experience (where relevant)	<p data-bbox="488 770 2069 836">Human Resources currently have no data for SQA that shows how many colleagues are Care Experienced, however SQA does acknowledge the following.</p> <p data-bbox="488 874 987 903">Nationally Who Cares? Scotland say:</p> <p data-bbox="488 943 629 971">Education</p> <p data-bbox="488 1015 2024 1080">In 2019/20 64% of all school leavers had 1 or more qualification at SCQF level 6 or better, whereas only 14% of school leavers looked after within the last year had qualifications of that level.</p> <p data-bbox="488 1118 2119 1216">Care Experienced children are less likely to be in positive destinations nine months after leaving school. Figures from 2019-20 show that 75% of school leavers looked after within the last year were in positive destinations. This is compared to 92% of all schools' leavers.</p> <p data-bbox="488 1254 2107 1382">At all levels, Care Experienced students have lower rates of completing courses compared to all students at university and college. Between Care Experienced students and non-Care Experienced students, there is a difference of 5.3% for retention at university, and the largest gap is in successful completion of full-time further education courses at college where the gap is 15.6% (SFC, 2019).</p>																				

Unemployment

9 months after leaving school, 22% of school leavers looked after within the last year people were classed as unemployed, compared to 7% of their non-Care Experienced peers (Scottish Government, 2021).

Criminalisation

In a Scottish Prison Service survey carried out in 2019, 1/4 of the adult prison population indicated that during their upbringing they had been in care (25%) (Scottish Prison Service, 2020).

Around 40% of young people in custody report that they have been in care (Scottish Prison Service, 2021).

Health

In a study conducted in 2002, among young people aged 5–17 years who were looked after by local authorities in Scotland, 45% were assessed as having a mental health issue (Office for National Statistics, 2004).

Homelessness

Practitioners estimate that between 30-50% of individuals who are homeless could be Care Experienced.

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
	Neutral impact recorded for this policy. We identified no realistic reason why or how this policy could adversely affect SQA employees of different ages.
	Advance equality of opportunity
	All SQA employees are entitled to use, access, and be subjected to the <i>Code of Conduct Policy</i> , regardless of their age.
	Foster good relations
	Whilst this policy does not explicitly reference <i>Age</i> , there no evidence to indicate that this policy does or does not foster good relations between employees of different age groups.

Protected Characteristic	General Equality Duty
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>The policy does reference some areas which will require a degree of professional judgment and reading of social situations e.g. recognising bribery, soliciting, corruption and circumstances that might affect an ability to remain impartial.</p> <p>Equality Risks: <i>Discrimination Arising from a Disability:</i></p> <p>We conclude a marginal risk may exist in respect of being able to effectively ‘read’ a social / business situation for employees who are neuro diverse.</p> <p>For example, mild autism may affect both perception and judgement. Whilst this may <i>explain</i> a potential breach of this policy, it may not necessarily <i>excuse</i> it. We do however recommend that SQA managers responsible for the implementation of this policy receive some guidance and training on how some neurodiverse conditions may affect perceptions of risk, danger, and inability to effectively ‘read’ certain social situations.</p> <p>However, given the extremely low number of people subjected to this policy we ultimately rate this risk as being ‘very minor’.</p>
	Advance equality of opportunity
	<p>This policy does not overtly advance <i>Equality of Opportunity</i>. Raising awareness of the two Equality risks identified as part of this Equality analysis would help users of this policy to understand how it could potentially affect some groups of people slightly differently. Also, <u>the policy is currently only available in one format, and we recommend it should be available in at least large print – possibly an easy read / summary version.</u></p>

	Foster good relations
<p>Disability (continued)</p>	<p>The Code of Conduct policy also states that all appointments to SQA through recruitment and selection must be made on the basis of merit and follow SQA’s Recruitment and Selection Policy. SQA’s Recruitment & Selection Policy promotes SQA’s commitment to the Disability Confident Initiative and therefore the Code of Conduct policy reinforces the promotion of equal opportunities for <i>Disabled</i> applicants and employees.</p> <p>Employers must do all they reasonably can to protect people from unfair treatment and take steps to prevent disability discrimination at work (ACAS). SQA’s grievance data is too low to provide meaningful context, however, gov.uk states that disabled people are significantly more likely to experience unfair treatment at work than non-disabled people. 8.2% of SQA’s workforce declared they have a disability and therefore are at a higher risk of experiencing unfair treatment and/or discrimination at work due to their disability.</p> <p>SQA’s Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (signposts to grievance procedure) which may help to tackle prejudice. SQA’s Disability Network which has disabled, and non-disabled members helps to raise awareness of disabilities at work at SQA, however as previously referenced, <u>it is recommended that consideration is given to providing anti-discrimination training / disability awareness training to staff or managers responsible for the implementation of this policy.</u></p>

Protected Characteristic	General Equality Duty
Race	<p data-bbox="488 264 2029 331">Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p data-bbox="488 405 730 437">Positive Impacts:</p> <p data-bbox="488 485 2018 632">The Code of Conduct specifically articulates that all employees must respect fellow employees of SQA and the role they play, treating them with courtesy and dignity at all times. Similarly, they must respect members of the public when performing duties as a member of SQA and observe the principles of the Code in dealings with the public when performing your duties as an employee of SQA.</p> <p data-bbox="488 679 2018 788">In addition, the Code of Conduct lays out several sections of behaviour which demonstrates the organisation's commitment to the General Equality Duty <u>When accepting gifts, consideration may have to be made regarding cultural differences and line managers may have to take this into account.</u></p> <p data-bbox="488 836 678 868">Appointments:</p> <p data-bbox="488 916 1989 983">SQA's Recruitment and Selection Policy is built on the principle that all appointments must be made based on merit. Employees must follow this SQA policy at all times.</p> <p data-bbox="488 1031 824 1062">Conduct at Social Events:</p> <p data-bbox="488 1110 1995 1334">SQA's policy on discrimination, victimisation, harassment, and bullying applies to work-related social events. Normal workplace standards of behaviour apply at work-related social events, and employees should not say or do anything that could offend or intimidate another person. Swearing and inappropriate language is unacceptable at work-related social events. Employees must not behave at any work-related social event in any way that could damage SQA or bring it into disrepute. It is important to note that employees may face disciplinary action for misconduct or gross misconduct outside of your normal workplace or working time.</p>

<p>Race (continued)</p>	<p>Positive Impacts: (continued)</p> <p>Dignity at Work</p> <p>SQA is committed to providing a working environment free from bullying and harassment where everyone is treated with dignity and respect, and everyone takes responsibility for their actions. There is no place for any form of bullying or harassment within SQA and everyone must always adhere to our Dignity at Work policy. Sexual harassment, harassment, bullying and victimisation will never be acceptable or tolerated by us and such conduct will always be addressed. We expect everyone to consistently treat others with consideration, courtesy, and respect.</p> <p>Equality and Diversity and Inclusion:</p> <p>SQA is committed to promoting equality and diversity among our workforce. We support a culture that actively values difference, recognising that people from different backgrounds and experiences can bring valuable insights and enhance the way we work. We aim to be an inclusive organisation, committed to providing equal opportunities throughout employment including in the recruitment, training development and career progression of staff. Sexual harassment, harassment, bullying and victimisation will never be acceptable or tolerated by us and such conduct will always be addressed. We believe such behaviour is not only unacceptable, but it is also contrary to our values, and we expect everyone to consistently treat others with consideration, courtesy, and respect. Further, sexual harassment may amount to both an employment rights and a criminal matter. Harassment under the Protection from Harassment Act 1997 –which is not limited to circumstances where harassment relates to a protected characteristic –is a criminal offence.</p>
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Race (continued)	Equality Risks: Indirect Race Discrimination:
	<p>Once again, we conclude a marginal risk may exist in respect of effectively ‘reading’ a social / business situation for employees who are drawn from different ethnicities, cultures, nationalities or for whom English is not their first language. Different cultural norms may potentially adversely affect decision making.</p> <p>Once again, whilst this may <i>explain</i> a potential breach of this policy, it may not necessarily <i>excuse</i> it. We recommend that SQA managers responsible for the implementation of this policy take into account and are aware of any cultural differences that could potentially affect decision making e.g. not saying ‘no’ directly, lack of candour to preserve ‘face’ and maintain social harmony (very important in some eastern cultures).</p>
	Advance equality of opportunity
	<p>All SQA employees with from all <i>Races/Ethnicities</i> are required to follow code of conduct.</p> <p><u>The policy is currently only available in the English language, and we recommend it should be available in the other key first languages spoken by SQA employees.</u></p>
	Foster good relations
<p>There is no evidence to indicate that this policy currently specifically fosters good relations between employees of different ethnicities.</p> <p>However, SQA is committed to providing a working environment free from bullying and harassment where everyone is treated with dignity and respect, and everyone takes responsibility for their actions. There is no place for any form of bullying or harassment within SQA and everyone must always adhere to our Dignity at Work policy.</p>	

Protected Characteristic	General Equality Duty
<p>Religion or Belief</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>Except for the potential duplication of the adverse impact listed in respect of Race/ Ethnicity on the previous page of this document, we identify no further Equality risks in respect of an employee’s Religion or Belief system.</p>
	<p>Advance equality of opportunity</p>
	<p>All SQA employees with from all <i>Religions/Beliefs</i> are required to follow code of conduct.</p> <p>Neutral Impact Recorded.</p>
	<p>Foster good relations</p>
<p>There is no evidence to indicate that this policy currently specifically fosters good relations between employees of different Religions/Beliefs</p>	

Protected Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>Positive Impact:</p> <p>The code of conduct specifically stipulates the SQA sexual harassment, bullying and victimisation is not acceptable at SQA - “Sexual harassment, harassment, bullying and victimisation will never be acceptable or tolerated by us and such conduct will always be addressed. We believe such behaviour is not only unacceptable, but it is also contrary to our values, and we expect everyone to consistently treat others with consideration, courtesy, and respect. Further, sexual harassment may amount to both an employment rights and a criminal matter. Harassment under the Protection from Harassment Act 1997 –which is not limited to circumstances where harassment relates to a protected characteristic –is a criminal offence”</p> <p>It goes further to say encompass Fair and Reasonable Treatment at Work</p> <p>“If you feel you have been asked or instructed by a colleague, an SQA Board member, a member of the public, or by an organisation, to act in a way which might be illegal, improper or unethical, or which is otherwise in conflict with the principles of this Code you are entitled to make use of the SQA Grievance policy and procedure for dealing with such concerns”</p> <p>Equality Risks:</p> <p>None identified.</p>
	Advance equality of opportunity
	As stated above, the code of conduct stipulates several responsibilities of employees which could assist in advancing equality of opportunity overall.

<p>Sex</p>	<p>Foster good relations</p>
	<p>Whilst this policy does specifically reference SQA's approach to sexual harassment and bullying, there is little evidence to indicate that this policy fosters good relations between employees of different sexes.</p> <p>A neutral equality impact is therefore recorded at this time.</p>
<p>Protected Characteristic</p>	<p>General Equality Duty</p>
<p>Sexual Orientation</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>All SQA employees from all Sexual Orientations are required to follow the Code of Conduct.</p> <p>We conclude there is no evidence to suggest that this policy may impact directly / indirectly on people due to their <i>Sexual Orientation</i> and therefore make no further recommendations in this area.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
	<p>Advance equality of opportunity</p>
	<p>All SQA employees are required to act in accordance with The Code of Conduct and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their <i>Sexual Orientation</i>.</p>
	<p>Foster good relations</p>
<p>A neutral equality impact is recorded.</p>	

Protected Characteristic	General Equality Duty
<p>Gender Re-assignment (Gender identity and transgender)</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>All SQA employees regardless of Gender Identity are required to follow code of conduct A neutral equality impact is recorded.</p>
	<p style="text-align: center;"><i>Advance equality of opportunity</i></p>
	<p>All SQA employees regardless of Gender Identity are required to follow code of conduct. There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their Gender Re-Assignment.</p>
	<p style="text-align: center;"><i>Foster good relations</i></p>
	<p>There is no evidence to indicate that this policy currently does not foster good relations between employees of different Gender Identities SQA is committed to providing a working environment free from bullying and harassment where everyone is treated with dignity and respect, and everyone takes responsibility for their actions. There is no place for any form of bullying or harassment within SQA and everyone must always adhere to our Dignity at Work policy Therefore, we conclude that this policy has a neutral equality impact, and no recommendations are made at this time.</p>

Protected Characteristic	General Equality Duty
<p>Marriage/Civil Partnership</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>We conclude there is no evidence to suggest that this policy may impact directly / indirectly on people who are <i>Married</i> or in a <i>Civil Partnership</i> and therefore make no further recommendations in this area.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
	<p>Advance equality of opportunity</p>
	<p>All SQA employees must familiarise themselves with the content of The Code of Conduct and act in accordance with it. There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their Marital Status.</p> <p>SQA has a 'Dignity at work' policy which describes our commitment to provide a working environment free from bullying and harassment where everyone is treated with dignity and respect. Therefore, this policy has a positive equality impact, and no recommendations are made at this time.</p>
	<p>Foster good relations</p>
	<p>Whilst this policy does not explicitly reference <i>Marriage/Civil Partnership</i>, there is little evidence to indicate that this policy does not foster good relations between employees of different marital status.</p> <p>No further recommendations are made in respect of this in relation to this policy.</p>

Protected Characteristic	General Equality Duty
Pregnancy / Maternity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>We conclude there is no evidence to suggest that this policy may impact directly / indirectly on people who are pregnant or on maternity and therefore make no further recommendations in this area.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
	Advance equality of opportunity
	<p>All SQA employees must familiarise themselves with the content of The Code of Conduct and act in accordance with it.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of Pregnancy/Maternity</p>
	Foster good relations
	<p>Whilst this policy does not explicitly reference <i>Pregnancy/Maternity</i> there is little evidence to indicate that this policy does not foster good relations between employees of different marital status.</p> <p>No further recommendations are made in respect of this in relation to this policy.</p>

Considered by SQA	General Equality Duty
Care experience (where relevant)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>Based on data from <i>whocarescotland.org</i> 25% of adult prison population has been brought up in care and further to this 40% of young people in custody have been in care. This data shows there is a higher possibility employees at SQA with Care experience may have a criminal conviction. However due to section 6.9 of Code of Conduct (see below) SQA states that they will consider if the conviction has a 'bearing on your ability to do your job.' therefore this policy does not impact directly / indirectly on people who have care experience and therefore make no further recommendations in this area.</p> <p>Neutral Equality related impact is recorded in this area.</p>
	Advance equality of opportunity
	Neutral Equality related impact is recorded in this area.
	Foster good relations
Neutral Equality related impact is recorded in this area.	

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.