



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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Equality Impact Assessment - Conflict of Interest Policy V.1.0

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	



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Review and assess on an annual basis all SQA employee lifecycle data	People Analytics, Governance & Systems Manager	Commencing annually from January 2024	
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	



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Identified Actions: General Equality Duty	Owner	Date	Comment & Review [ONGOING RECORD]
The policy is currently only available in the English language, and it is recommended that it should be available in different formats and languages to ensure equality of accessibility.	Head of HR	By September 2024	Further consideration is required corporately given SQA currently only produces documents in other languages upon request - it's important to record our justification for decisions taken/which community languages are required
Add <i>Gender Identity</i> (i.e. people who identify as more than one gender or none) to all future Equality Monitoring reporting	Head of HR	By September 2024	
Because there is a marginal risk that an employee may not realise or understand (on the grounds of their Disability) that their conduct actually represents a conflict of interest under this policy we recommend that an advisory comment be placed in the policy to reflect considering adjustments in the respect of the above i.e. where a conflict of interest has occurred but has not been realised on the grounds of a person's disability.	Head of HR	By September 2024	



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Policy Aims:

Name of Policy or Practice:	Conflict of Interest
New Policy or Revision ?	Revision
Name of Policy Owner:	Head of Human Resources
Date Policy Owner Confirmed Completion:	11/07/2022

What is the rationale for this policy or practice?

This document outlines the policy and procedure for declaring any conflict of interests and highlights associated SQA policies and documents.



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

As a public body, SQA has a responsibility to ensure that all employees behave ethically. The OECD Toolkit for Managing Conflict of Interest in the Public Sector states that “Identifying and resolving conflict-of-interest situations is crucial to good governance and maintaining trust in public institutions”.

As such, it is considered best practice for all public bodies to set out their expectations of their employees with regard to ethics and integrity when acting for their organisations.

The overall sample size of people being subjected to remedial or disciplinary action within SQA under the *Conflict of Interest* policy during the last two years is none. Profiling information (e.g. Age, Sex etc) relating to employees subjected to this policy is not therefore available.

We therefore conclude

- (i) There is a non-existent data sample relating to the use of this policy in SQA.**
- (ii) It is 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 no evidence within SQA to specifically support some of the findings of this assessment.

There is no national statistical evidence available relating to people or characteristics of people more likely to be in breach of an organisations *Conflict of Interest* policy.



What are the aims of this policy or practice?

This policy has been developed to ensure that SQA employees are aware that they must not allow any private interest to influence any of their decisions connected to their employment with us. In addition, this policy has been developed to enable both managers and employees to ensure that there is no conflict of interest in relation to how they develop, deliver and award qualifications. This is a preventative policy, which means it is designed to help SQA's employees avoid any potential conflicts.

The policy has also been designed *The Seven Principles of Public Life* (also known as the Nolan Principles) which apply to anyone who works as a public office-holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, education, social and care services. All public office-holders are both servants of the public and stewards of public resources. The principles also apply to all those in other sectors delivering public services.

The seven principles are shown below (direct references to this policy are also highlighted)

- **1 Selflessness** - Holders of public office should act solely in terms of the public interest.
- **2 Integrity** - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- **3 Objectivity** - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- **4 Accountability** - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- **5 Openness** - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- **6 Honesty** - Holders of public office should be truthful.
- **7 Leadership** - Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.



What are the aims of this policy or practice? (continued)

The following SQA policies are also related to the *Conflict of Interest* policy:

- Anti-Bribery and Corruption
- Addressing Financial Irregularity
- Code of Conduct
- Consultants (engagement of)
- Copyright Guidelines
- Disciplinary
- Gifts and Hospitality
- Grievance
- Information Security
- Malpractice in Internally Assessed Qualifications
- Probation
- Retention and Redeployment
- Staff Leave
- TOIL



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

As previously stated, there is an insignificant (or non-existent) data sample of employees being disciplined to suggest any negative impacts on SQA employees. (No employees have disciplined under the Conflict of Interest Policy in the past year)



Evidence, Consultation and Engagement

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

As this is an internal policy, the SQA has consulted with staff network groups and our trade unions. 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.



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

Evidence of Stakeholder Engagement:

Trade Union Consultation Review Group (PRG):

Members of SQA Human Resources department and trade union representatives from *Unite the Union* and *Unison* meet weekly in SQA via the PRG. This group has been meeting weekly in SQA since July 2020. SQA's trade union representatives are also given statutory time off to attend relevant training, meetings and other information gathering activities as supported in our union framework agreement.

Evidence of all meeting minutes, actions and consultation undertaken with the PRG group (including Equality considerations in respect of all policies, activities, and functions) is detailed on a dedicated SQA shared resources site.

Staff Network Consultations:

In June 2021, we formed a dedicated *Equality Impact Assessment Project Group* (EIAPG) with the aim of reviewing, assessing, and providing feedback from staff on all SQA HR policies from Equality perspectives.

The EIAPG group consists of representatives from each of the SQA staff networks listed on the previous page of this document.

Evidence, feedback, and actions from all EIAPG staff network consultations are recorded on a dedicated SQA *Microsoft Teams* page which was specifically created with the aim of listing potential equality risks that exist in H.R. policies / activities, sharing resources, recording feedback, and scheduling future consultation meetings.



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

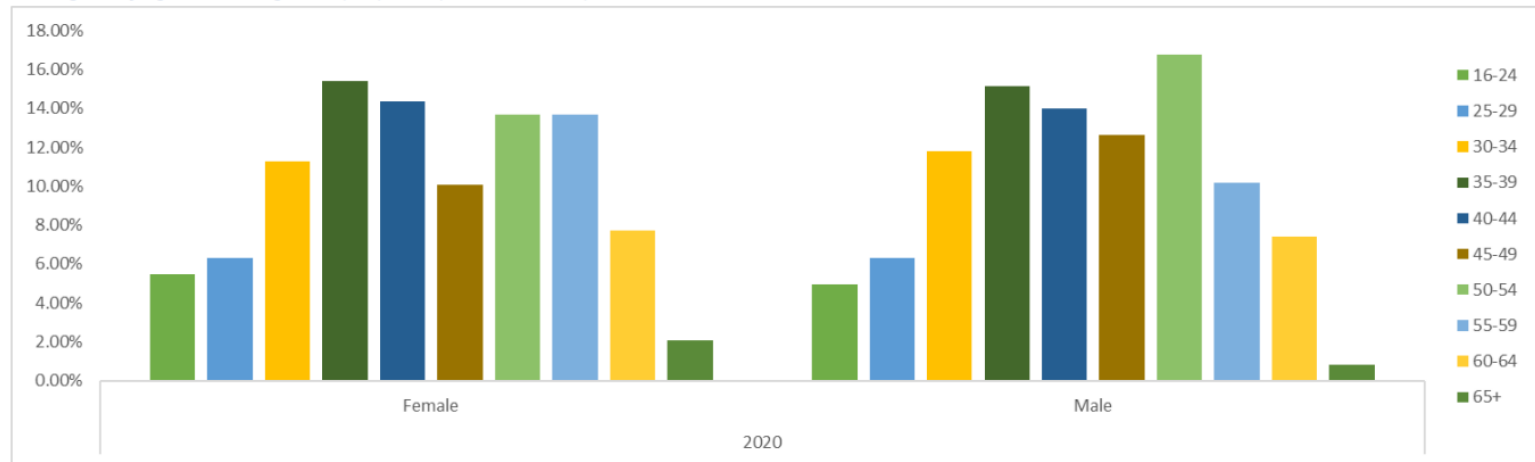
The table below details the evidence of staff network consultation meetings.

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:

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



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.

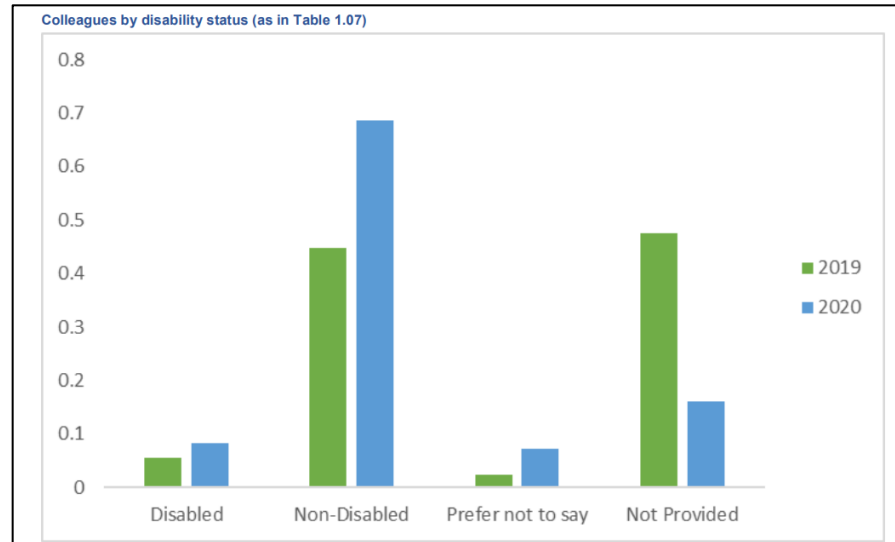
The 30–34 age band saw the largest reduction of female colleagues – a total of seven people. Over the same period, there was an increase in the proportion of male colleagues within the 50-54 age band - an overall increase of nine people. The largest decline in the proportion of male colleagues was in 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.



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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 (roughly 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%.

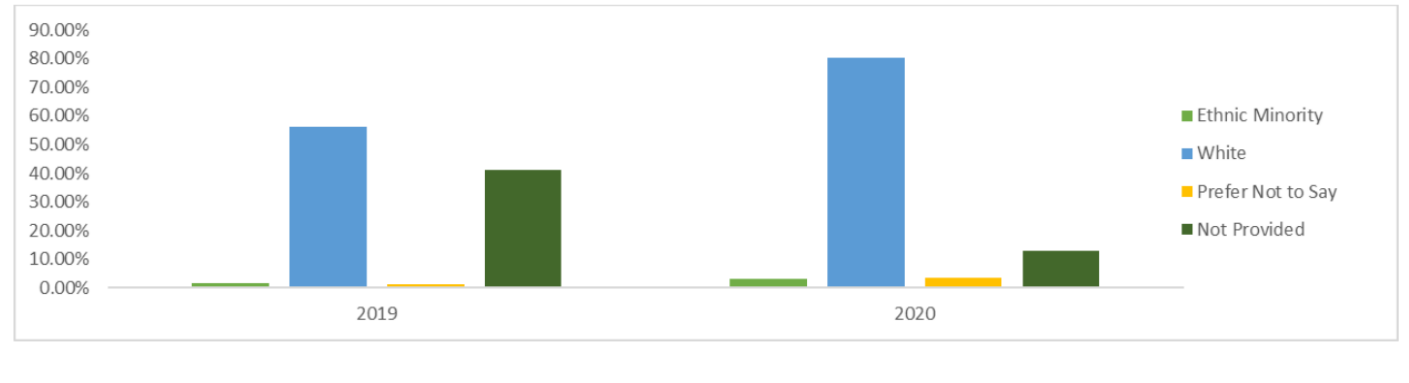


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**Race
Ethnicity**

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)



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.

**Race
Ethnicity
(continued)**

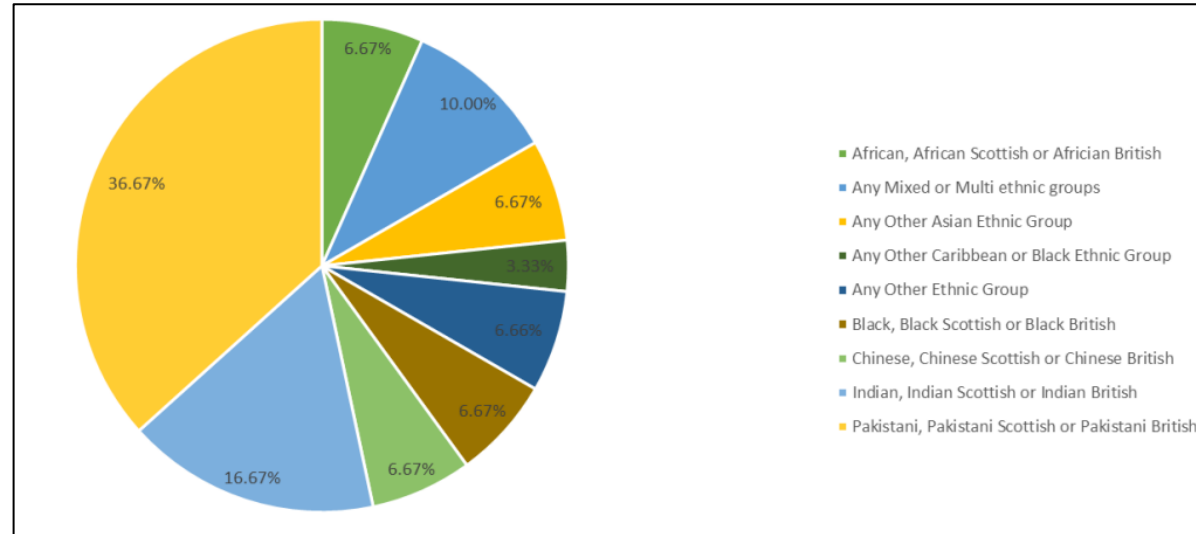


Table 1.15 Race: Colleagues by black and minority ethnicities

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



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

Religion or Belief

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%	

The above table shows colleagues who have declared their Religion or Belief. This table 1.16 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

An improved declaration rate was also shown for this characteristic in 2020. *Christian* and *No Religion* account for nearly 60% of all responses.



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Sex

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%

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

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.



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

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



What evidence about equality groups do you have to support this assessment? (continued)																					
Gender Re-assignment (Gender identity and transgender)	<p>No equality profiling data is currently captured by the SQA.</p> <p>One of the recommendations from this Equality Impact Assessment is that the <u>SQA adds <i>Gender Identity</i> (i.e. people who identify as more than one gender or none) to all future Equality Monitoring reporting.</u></p>																				
Marriage/Civil Partnership	<p>No equality profiling data is currently captured by the SQA.</p>																				
Pregnancy / Maternity	<table border="1" style="margin-left: auto; margin-right: auto;"> <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>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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Total	100.00%	100.00%																			



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

**Care experience
(where relevant)**

Human Resources currently have no data for SQA that shows how many colleagues are Care Experienced.

Nationally **Who Cares? Scotland** say:

Education

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.

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.

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).

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



	<p>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%) (<u>Scottish Prison Service, 2020</u>).</p> <p>Around 40% of young people in custody report that they have been in care (<u>Scottish Prison Service, 2021</u>).</p> <p>Health</p> <p>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 (<u>Office for National Statistics, 2004</u>).</p> <p>Homelessness</p> <p>Practitioners estimate that between 30-50% of individuals who are homeless could be Care Experienced.</p> <p>Currently, no equality data on Care Experience is collected from those who have undergone the disciplinary procedure at SQA, and in addition these numbers are too low to allow any data analysis. <u>It is a recommendation of this EQIA that equality data is collected and then analysed when numbers are sufficient.</u></p>
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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 needs 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.

Use of the term Discrimination:

Please note that for the purposes of this document we have used the term Discrimination as a generic descriptor which takes into account six discrete elements:

- Direct Discrimination
- Indirect Discrimination
- Harassment
- Victimisation
- Discrimination by perception
- Associative discrimination



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Protected Characteristic	General Equality Duty
Age	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the <i>Equality Act 2010</i> .
	<p>The conflict of interest policy specifically outlines that reasonable adjustments will be made to ensure that we do not put anyone with a 'Protected Characteristic' at a substantial disadvantage.</p> <p>Risks of Age Discrimination:</p> <p>There is no evidence available – either locally in SQA or nationally to suggest that people of different Age groups may be at a greater risk of transgressing a <i>Conflict of Interest</i> policy.</p> <p>We conclude there is no evidence to suggest that this policy may impact directly / indirectly on age 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 of all ages are required to declare any conflict of interest.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their age.</p>
	Foster good relations
	<p>There is no evidence to indicate that this policy would foster good relations between employees of different ages.</p>



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Protected Characteristic	General Equality Duty
<p>Disability</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>Risks of Discrimination:</p> <p>The <i>Conflict of Interest</i> policy specifically outlines that reasonable adjustments will be made to ensure that we do not put anyone with a 'Protected Characteristic' at a substantial disadvantage.</p> <p>There is no evidence available – either locally in SQA or nationally to suggest that people who are Disabled (or not Disabled) may be at a greater risk of transgressing a <i>Conflict of Interest</i> policy.</p> <p>We conclude there is no evidence to suggest that this policy may impact directly / indirectly on people with disabilities. (Please see advisory comments below.)</p> <p>Advisory Comments:</p> <p><u>We conclude that there is a marginal risk that an employee may not realise or understand (on the grounds of their Disability) that their conduct actually represents a conflict of interest under this policy. This might explain but may not necessarily excuse such conduct and we recommend that an advisory comment be placed in the policy to reflect considering adjustments in the respect of the above i.e. where a conflict of interest has occurred but has not been realised on the grounds of a person's disability.</u></p>



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Protected Characteristic	General Equality Duty
Disability (continued)	Advance equality of opportunity
	<p>All SQA employees are required to declare any conflict of interest.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of a disability.</p> <p>No further recommendations are made in relation to this policy</p>
	Foster good relations
	<p>There is no evidence to indicate that this policy would foster good relations between employees.</p>



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Protected Characteristic	General Equality Duty
Race	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>Risks of Discrimination:</p> <p>The <i>Conflict of Interest</i> policy specifically outlines that reasonable adjustments will be made to ensure that we do not put anyone with a 'Protected Characteristic' at a substantial disadvantage.</p> <p>There is no evidence available – either locally in SQA or nationally to suggest that people of different nationalities or ethnicities may be at a greater risk of transgressing a <i>Conflict of Interest</i> policy.</p> <p>It was noted that some cultures and ethnicities may have different expectations placed upon them by their family or immediate communities and that this should be taken into account by SQA, and employees line managers should disciplinary action arise from an unreported conflict of interest. There also may be differing cultural norms with regards to what would constitute a conflict of interest.</p> <p>This is however, judged to be a minor risk to SQA and should be mitigated by clear direction to the Conflict of Interest Policy and any other related policies on joining SQA.</p> <p><u>It also should be noted that the policy is only available in English and to increase accessibility for those ethnicities where English is not their first language it is recommended that the policy be available in other first languages spoken by SQA employees.</u></p>



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Race (continued)	Advance equality of opportunity
	<p>SQA employees from all <i>Races/Ethnicities</i> are required to declare any conflict of interest.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their <i>Race or Ethnicity</i>.</p>
Race (continued)	Foster good relations
	<p>There is no evidence to indicate that this policy would foster good relations between employees of different Races.</p>



Equality Impact Assessment - Conflict of Interest Policy V.1.0

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
	<p>Risks of Discrimination:</p> <p>The <i>Conflict of Interest</i> policy specifically outlines that reasonable adjustments will be made to ensure that we do not put anyone with a 'Protected Characteristic' at a substantial disadvantage.</p> <p>There is no evidence available – either locally in SQA or nationally to suggest that people of different Religions or Beliefs may be at a greater risk of transgressing a <i>Conflict of Interest</i> policy.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
	<p style="text-align: center;">Advance equality of opportunity</p>
	<p>SQA employees from all <i>Religion/Beliefs</i> are required to declare any conflict of interest.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their <i>Religion/Belief</i></p>
	<p style="text-align: center;">Foster good relations</p>
	<p>There is no evidence to suggest that the Conflict of Interest policy fosters good relations between employees of differing religions or beliefs.</p>



Equality Impact Assessment - Conflict of Interest Policy V.1.0

Protected Characteristic	General Equality Duty
Sex (continued)	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010 (continued)</p> <p>Risks of Discrimination:</p> <p>The <i>Conflict of Interest</i> policy specifically outlines that reasonable adjustments will be made to ensure that we do not put anyone with a 'Protected Characteristic' at a substantial disadvantage.</p> <p>There is no evidence available – either locally in SQA or nationally to suggest that people of different sexes may be at a greater risk of transgressing a <i>Conflict of Interest</i> policy.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
Sex (continued)	<p>Advance equality of opportunity</p> <p>All SQA employees, regardless of Sex are required to declare any conflict of interest.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their Sex.</p>
Sex (continued)	<p>Foster good relations</p> <p>There is no evidence to suggest that the Conflict of Interest policy fosters good relations between employees of differing sexes.</p>



Equality Impact Assessment - Conflict of Interest Policy V.1.0

Protected Characteristic	General Equality Duty
Sexual Orientation	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>The <i>Conflict of Interest</i> policy specifically outlines that reasonable adjustments will be made to ensure that we do not put anyone with a 'Protected Characteristic' at a substantial disadvantage.</p> <p>There is no evidence available – either locally in SQA or nationally to suggest that people of different Sexual Orientations may be at a greater risk of transgressing a <i>Conflict of Interest</i> policy.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
	<p style="text-align: center;">Advance equality of opportunity</p>
	<p>All SQA employees, regardless of gender identity are required to declare any potential conflict of interest. There is no evidence to suggest that the policy advances equality of opportunity in SQA</p> <p>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 style="text-align: center;">Foster good relations</p>
	<p>We conclude there is no evidence to suggest that this policy advances the fostering of good relations between employees of differing sexual orientations.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>



Equality Impact Assessment - Conflict of Interest Policy V.1.0

Protected Characteristic	General Equality Duty
<p>Gender Identity.</p> <p>This includes:</p> <p>Gender Re-assignment</p> <p>Non Binary</p> <p>Gender Fluid</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <hr/> <p>There is no evidence available – either locally in SQA or nationally to suggest that people of different sexes may be at a greater risk of transgressing a <i>Conflict of Interest</i> policy.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
<p>Gender Identity.</p> <p>This includes:</p> <p>Gender Re-assignment</p> <p>Non Binary</p> <p>Gender Fluid</p> <p>(continued)</p>	<p>Advance equality of opportunity</p> <hr/> <p>All SQA employees, regardless of gender identity are required to declare any potential conflict of interest. There is no evidence to suggest that the policy advances equality of opportunity in SQA</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their <i>Gender Identity</i></p> <p>Neutral Equality impact is recorded</p> <hr/> <p>Foster good relations</p> <hr/> <p>We conclude there is no evidence to suggest that this policy advances the fostering of good relations between employees of differing gender identities.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>



Equality Impact Assessment - Conflict of Interest Policy V.1.0

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>As a project team completing this EqIA, we briefly explored how being in a relationship with another SQA employee could, in itself, represent a conflict of interest. Particularly where a manager is in a relationship with a subordinate, and this may result in more (or less) favourable treatment in certain workplace activities e.g:</p> <ul style="list-style-type: none"> ▪ Awarding bonuses / pay increments ▪ Annual Appraisals ▪ Work allocation <p>We did however conclude that if two colleagues are <i>Married</i> (same or opposite sex) or in a <i>Civil Partnership</i> with one another, there would be a wholly reasonable expectation that this is declared to SQA and the resulting conflict of interest would be mitigated.</p> <p>Given the current non-existent sample size in SQA in respect of this policy, ultimately concluded a Neutral Equality impact in this area.</p>
	<p>Advance equality of opportunity</p>
	<p>All SQA employees regardless of marital status are required to declare any potential conflict of interest.</p>
	<p>Foster good relations</p>
	<p>We conclude there is no evidence to suggest that this policy advances the fostering of good relations between employees of with differing marital status.</p>



Equality Impact Assessment - Conflict of Interest Policy V.1.0

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 Pregnancy/Maternity and therefore make no further recommendations in this area.</p> <p>Neutral Equality related impact is therefore recorded in this area.</p>
	<p style="text-align: center;">Advance equality of opportunity</p>
	<p>All SQA employees are required to declare any conflict of interest.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their <i>Pregnancy/ Maternity</i></p>
	<p style="text-align: center;">Foster good relations</p>
<p>No evidence available to indicate this policy does foster good relations.</p>	



Equality Impact Assessment - Conflict of Interest Policy V.1.0

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>We conclude there is no evidence to suggest that this policy may impact directly / indirectly on Care Experience 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 are required to declare and conflict of interest.</p> <p>There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of Care Experience.</p>
	Foster Good Relations
<p>No evidence identified.</p>	