



## Equality Impact Assessment - Conflict of Interest Policy


### 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.

<b>Agreed Schedule Review Date</b>	By September 2027	<b>Additional Schedule Review Date</b>	By September 2026
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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 <b>monitor the implementation of policy and the impact on equality groups</b> (evidence and consultation) Equality Impact Assessment - Conflict of Interest Policy			<b>[ONGOING RECORD]</b>
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	<b>Continue to review</b>
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	<b>Continue to review</b>
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	<b>Continue to review</b>
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	<b>Continue to review</b>
Continue to review and assess on an annual basis SQA's engagement People survey	OD Manager	Commencing annually from October 2023	<b>Continue to review</b>
Review and assess on an annual basis all SQA employee lifecycle data	People Analytics, Governance & Systems Manager	Commencing annually from January 2024	<b>Continue to review</b>
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	<b>Continue to review</b>



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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	<b>Continue to review</b>

**Explain how you will monitor and record the actual impact on equality groups, including how the evidence can be revisited to measure the actual impact.**

Identified Actions: General Equality Duty	Owner	Date	Comment & Review [ONGOING RECORD]

#### Policy Aims:

<b>Name of Policy or Practice:</b>	Conflict of Interest
<b>New Policy or Revision ?</b>	Revision
<b>Name of Policy Owner:</b>	Head of Human Resources
<b>Date Policy Owner Confirmed Completion:</b>	2 September 2024

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



## Equality Impact Assessment - Conflict of Interest Policy

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.



## Equality Impact Assessment - 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.



## Equality Impact Assessment - Conflict of Interest Policy

### 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



## Equality Impact Assessment - Conflict of Interest Policy

### 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)



## Equality Impact Assessment - Conflict of Interest Policy

### Evidence, Consultation and Engagement

#### What stakeholders have you engaged within 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
- SQA Rainbow Network
- Women's Network
- Men's Shed?
- Parents and Carers

#### 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.





## Equality Impact Assessment - Conflict of Interest Policy

**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.

We met with the policy review group on 14 December. The policy was under consultation for two weeks and feedback reviewed and implemented.

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

**Staff Network Consultations:**

Have been consulted through the Equality Management Review Group corporate process group.

**Evidence, feedback, and actions from staff network consultations** included within the assessment.



## Equality Impact Assessment - Conflict of Interest Policy

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

#### Age:

**Table 1.1: Age**

Age bracket	2019 no	2019 %	2020 no	2020 %	2021 no	2021 %	2022 no	2022 %	Variance no	Variance %
16–24	59	6.32%	50	5.27%	49	4.93%	36	3.47%	-23	-2.85%
25–29	65	6.97%	60	6.32%	73	7.35%	105	10.14%	40	3.17%
30–34	123	13.18%	109	11.49%	96	9.67%	95	9.17%	-28	-4.01%
35–39	131	14.04%	145	15.28%	146	14.70%	144	13.90%	13	-0.14%
40–44	129	13.83%	135	14.23%	146	14.70%	150	14.48%	21	0.65%
45–49	116	12.43%	105	11.06%	113	11.38%	124	11.97%	8	-0.46%
50–54	125	13.40%	141	14.86%	131	13.19%	126	12.16%	1	-1.24%
55–59	119	12.75%	117	12.33%	122	12.29%	122	11.78%	3	-0.98%
60–64	53	5.68%	72	7.59%	81	8.16%	102	9.85%	49	4.16%
65+	13	1.39%	15	1.58%	36	3.63%	32	3.09%	19	1.70%
<b>Total</b>	<b>933</b>	<b>100.00%</b>	<b>949</b>	<b>100.00%</b>	<b>993</b>	<b>100.00%</b>	<b>1036</b>	<b>100.00%</b>	<b>103</b>	<b>11.04%</b>

Table 1.1 shows the age profile of the organisation from 2019 to 2022

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)



## Equality Impact Assessment - Conflict of Interest Policy

Disability

Table 3.1: Disability										
Disability	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %	Variance number	Variance %
No	417	44.69%	651	68.60%	683	68.78%	697	67.28%	280	22.59%
Not Specified	444	47.59%	152	16.02%	152	15.31%	184	17.76%	-260	-29.83%
Prefer not to say	21	2.25%	68	7.17%	76	7.65%	72	6.95%	51	4.70%
Yes	51	5.47%	78	8.22%	82	8.26%	83	8.01%	32	2.54%
Total	933	100.00%	949	100.00%	993	100.00%	1036	100.00%	103	0.00%

Source: SQA Workforce Equality Monitoring Report 2021-23  
[Equalities: SQA workforce monitoring report 2021-23](#)

Table 3.1 shows the composition of the disability self-reporting categories for the period from 2019 to 2022.

Of those staff who have declared a disability, females made up 58.54% (2021) and 53.01% (2022) of the population, and males 41.46% (2021) and 46.99% (2022). Due to the low number of staff declaring a disability within SQA we are unable to publish further intersectional data in relation to disability and other protected characteristics.



## Equality Impact Assessment - Conflict of Interest Policy

### Race Ethnicity

**Table 7.1: Race**

Ethnicity	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
African, Scottish African or British African	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Asian, Scottish Asian or British Asian	13	1.39%	20	2.11%	24	2.42%	25	2.41%
Caribbean or Black	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Mixed or multiple ethnic group	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Not specified	383	41.05%	123	12.96%	101	10.17%	122	11.78%
Other ethnic group	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Prefer not to say	10	1.07%	33	3.48%	34	3.42%	30	2.90%
White	523	56.06%	763	80.40%	825	83.08%	849	81.95%

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)

Table 7.1 shows the ethnic minority background of staff within the organisation for the period from 2019 to 2022

Just under 3.50% staff declared they were from an ethnic minority background in both 2021 (3.32%) and 2022 (3.38%). However, it is encouraging to note that the percentage of staff declaring they are from an ethnic minority background has increased overall by 3.97% between 2019 and 2022. The percentage of staff within each ethnic minority category has remained relatively stable over the last three years.

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

**Religion or Belief**

**Table 8.1: Religion or belief**

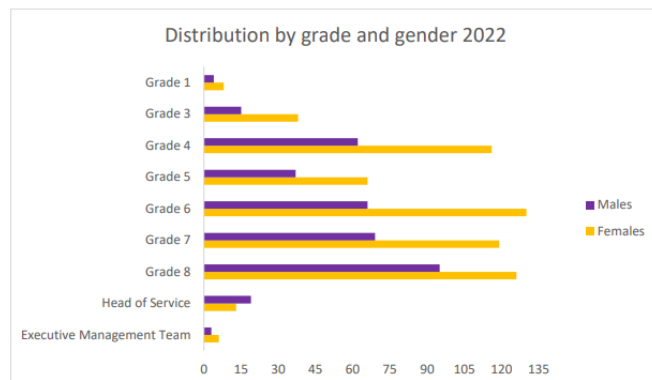
Religion or belief	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
Another religion or body	< 5	< 0.54%	< 5	< 0.53%	6	0.60%	6	0.58%
Buddhist	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Church of Scotland	91	9.75%	122	12.86%	127	12.79%	125	12.07%
Hindu	< 5	< 0.54%	< 5	< 0.53%	7	0.70%	8	0.77%
Jewish	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Muslim	7	0.75%	11	1.16%	10	1.01%	11	1.06%
None	286	30.65%	421	44.36%	462	46.53%	489	47.20%
Not specified	405	43.41%	126	13.28%	102	10.27%	123	11.87%
Other Christian	26	2.79%	43	4.53%	44	4.43%	44	4.25%
Prefer not to say	35	3.75%	98	10.33%	103	10.37%	103	9.94%
Roman Catholic	76	8.15%	118	12.43%	129	12.99%	123	11.87%
Sikh	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%

Table 8.1 shows the religion, belief or non-belief status of staff within the organisation for the period from 2019 to 2022.  
 Source: SQA Workforce Equality Monitoring Report 2021-23  
[Equalities: SQA workforce monitoring report 2021-23](#)

## Sex

### Gender

Distribution by grade and gender of SQA grade 1 – EMT



Source: SQA Summary of Equal Pay Audit 2023

[Scottish Qualifications Authority \(sqa.org.uk\)](https://www.sqa.org.uk)

The majority of the 2.9 million lone-parent families in 2022 were headed by a lone mother (2.5 million, 84%)

Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2022>

59% of unpaid carers are women (Census 2021). Women are more likely to become carers and to provide more hours of unpaid care than men. More women than men provide high intensity care at ages when they would expect to be in paid work (Petrillo and Bennett, 2022)

Source: Carers UK

There are 1.25 million sandwich carers in the UK. These are people caring for an older relative as well as bringing up a family. 68% (850,743) are women.

Source: <https://www.ageuk.org.uk/our-impact/campaigning/care-in-crisis/breaking-point-report/>



## Equality Impact Assessment - Conflict of Interest Policy

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

#### Sexual Orientation

**Table 10.1: Sexual orientation**

Sexual Orientation	2019 number	2019%	2020 number	2020%	2021 number	2021%	2022 number	2022%
Bisexual	9	0.96%	12	1.26%	15	1.51%	16	1.54%
Gay man	13	1.39%	20	2.11%	21	2.11%	23	2.22%
Gay woman / lesbian	9	0.96%	10	1.05%	12	1.21%	12	1.16%
Heterosexual / straight	431	46.20%	670	70.60%	700	70.49%	702	67.76%
In another way	< 5	< 0.54%	< 5	< 0.53%	< 5	< 0.50%	< 5	< 0.48%
Not specified	< 5	< 0.54%	< 5	< 0.53%	156	15.71%	189	18.24%
Not sure	26	2.79%	76	8.01%	< 5	< 0.50%	< 5	< 0.48%
Prefer not to say	443	47.48%	158	16.65%	84	8.46%	88	8.49%

Table 10.1 shows the composition of staff sexual orientation within the organisation for the period 2019 to 2022.

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)

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

#### Gender Re-assignment (Gender identity and transgender)

Due to the low number of staff reporting as transgender or describing their gender identity 'in another way', we are unable to publish further data in relation to gender reassignment or gender identity. This data is, however, monitored internally.



## Equality Impact Assessment - Conflict of Interest Policy

### Marriage/Civil Partnership

**Table 5.1: Relationship status**

Relationship status	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %
Civil Partnership	7	0.75%	7	0.74%	8	0.81%	9	0.87%
Co-habiting/in a relationship	80	8.57%	112	11.80%	122	12.29%	122	11.78%
Divorced/Dissolved Civil Partnership	14	1.50%	16	1.69%	17	1.71%	19	1.83%
Married	265	28.40%	370	38.99%	425	42.80%	416	40.15%
Married/Civil Partnership	8	0.86%	12	1.26%	14	1.41%	16	1.54%
Not Specified	407	43.62%	179	18.86%	102	10.27%	127	12.26%
Other	< 5	< 0.54%	< 5	< 0.53%	7	0.70%	9	0.87%
Prefer not to say	18	1.93%	49	5.16%	55	5.54%	59	5.69%
Separated	6	0.64%	12	1.26%	12	1.21%	13	1.25%
Single	122	13.08%	183	19.28%	224	22.56%	239	23.07%
Widowed/surviving partner from Civil Partnership	< 5	< 0.54%	6	0.63%	7	0.70%	7	0.68%

Table 5.1 shows the marriage and civil partnership status of staff within the organisation for the period from 2019 to 2022.

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)





## Equality Impact Assessment - Conflict of Interest Policy

Pregnancy / Maternity

Pregnancy and maternity	2019 number	2019 %	2020 number	2020 %	2021 number	2021 %	2022 number	2022 %
Contract ended as planned					1	3.33%		0.00%
Due to return to work					0	0.00%	11	40.00%
Resigned					0	0.00%	1	4.00%
Returned to work	20	100.00%	10	100.00%	29	96.67%	14	56.00%
Total	20	100.00%	10	100.00%	30	100.00%	26	100.00%

Table 6.1 details the number of staff who have taken maternity leave, whether they are still on maternity leave (due to return to work), have returned to work following maternity leave, resigned following maternity leave, or their fixed-term contract ended (contract ended as planned).

Source: SQA Workforce Equality Monitoring Report 2021-23

[Equalities: SQA workforce monitoring report 2021-23](#)



Equality Impact Assessment - Conflict of Interest Policy

What evidence about equality groups do you have to support this assessment? (continued)	
Care experience (where relevant)	SQA does not currently collect Care Experience data.



## Equality Impact Assessment - Conflict of Interest Policy

### **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



## Equality Impact Assessment - Conflict of Interest Policy

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><b>Risks of Age Discrimination:</b></p> <p>There is no evidence available – either locally in SQA or nationally to suggest that people of different <i>Age</i> 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><b>Neutral Equality related impact is therefore recorded in this area.</b></p>
	Advance equality of opportunity
	All SQA employees of all ages are required to declare any conflict of interest.
	There is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their age.
	Foster good relations
	There is no evidence to indicate that this policy would foster good relations between employees of different ages.
Protected Characteristic	General Equality Duty
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010



## Equality Impact Assessment - Conflict of Interest Policy

### **Risks of Discrimination:**

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.

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 *Conflict of Interest* policy.

We conclude there is no evidence to suggest that this policy may impact directly / indirectly on people with disabilities. (Please see advisory comments below.)

### **Advisory Comments:**

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.



Equality Impact Assessment - Conflict of Interest Policy

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>



Equality Impact Assessment - Conflict of Interest Policy

Protected Characteristic	General Equality Duty
<b>Race</b>	<p data-bbox="483 355 2031 416">Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p data-bbox="483 448 824 480"><b>Risks of Discrimination:</b></p> <p data-bbox="483 536 1989 608">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 data-bbox="483 655 2018 799">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 considered 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 data-bbox="483 847 2011 919">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>



Equality Impact Assessment - Conflict of Interest Policy

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

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
	<b>Risks of Discrimination:</b>  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.
	<b>Neutral Equality related impact is therefore recorded in this area.</b>
	Advance equality of opportunity
	SQA employees from all <i>Religion/Beliefs</i> are required to declare any conflict of interest.  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>
	Foster good relations  There is no evidence to suggest that the Conflict of Interest policy fosters good relations between employees of differing religions or beliefs.



# Equality Impact Assessment - Conflict of Interest Policy

Protected Characteristic	General Equality Duty
Sex (continued)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010 (continued)
	<p><b>Risks of Discrimination:</b></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><b>Neutral Equality related impact is therefore recorded in this area.</b></p>
Sex (continued)	Advance equality of opportunity
	<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)	Foster good relations
	<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

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>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><b>Neutral Equality related impact is therefore recorded in this area.</b></p>
	Advance equality of opportunity
	<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>
	Foster good relations
	<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><b>Neutral Equality related impact is therefore recorded in this area.</b></p>
Protected Characteristic	General Equality Duty



## Equality Impact Assessment - Conflict of Interest Policy

<b>Gender Identity.</b>  <b>This includes:</b>  <b>Gender Re-assignment</b>  <b>Non Binary</b>  <b>Gender Fluid</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	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.
	<b>Neutral Equality related impact is therefore recorded in this area.</b>
	Advance equality of opportunity
<b>Gender Identity.</b>  <b>This includes:</b>  <b>Gender Re-assignment</b>  <b>Non Binary</b>  <b>Gender Fluid</b>  <b>(continued)</b>	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
	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>
	<b>Neutral Equality impact is recorded</b>
	Foster good relations
	We conclude there is no evidence to suggest that this policy advances the fostering of good relations between employees of differing gender identities.
	<b>Neutral Equality related impact is therefore recorded in this area.</b>
<b>Protected Characteristic</b>	<b>General Equality Duty</b>



## Equality Impact Assessment - Conflict of Interest Policy

<b>Marriage/Civil Partnership</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p><a href="#">People Management</a> 2023 state that “Romantic workplace relationships can raise sensitive issues for employers. On the one hand the private lives of employees should be respected. On the other, the interests of the employer may be seriously affected by complications arising in a relationship”</p> <p>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"> <li>▪ Awarding bonuses / pay increments</li> <li>▪ Annual Appraisals</li> <li>▪ Work allocation</li> <li>▪ Favouritism</li> </ul> <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 <b>Neutral Equality impact in this area.</b></p>
	Advance equality of opportunity
	All SQA employees regardless of marital status are required to declare any potential conflict of interest.
	Foster good relations



## Equality Impact Assessment - Conflict of Interest Policy

	We conclude there is no evidence to suggest that this policy advances the fostering of good relations between employees of with differing marital status.
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# Equality Impact Assessment - Conflict of Interest Policy

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><b>Neutral Equality related impact is therefore recorded in this area.</b></p>
	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 their <i>Pregnancy/ Maternity</i></p>
	<p>Foster good relations</p> <p>No evidence available to indicate this policy does foster good relations.</p>



# Equality Impact Assessment - Conflict of Interest Policy

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><b>Neutral Equality related impact is therefore recorded in this area.</b></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
	No evidence identified.