

# 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	30 April 2026	Additional Schedule Review Date	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.

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)			<b>[ONGOING RECORD]</b>
Union consultation and feedback	Senior Accounting Manager	August 2023	This policy will be sent for union consultation and approval.
Staff Network Consultation	Senior Accounting Manager	August 2023	This policy will be sent for staff network consultation and approval.

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
Credit Card Return Method Updated	Advancing Equality of Opportunity.	Senior Accounting Manager	June 2023	The policy has been updated to remove the necessity for the card holder to return the card in person to the office. We have now amended this to allow the card to be returned by Royal Mail secure delivery.
<b>Return of credit card for long-term leave updated</b>	Advancing Equality of Opportunity.	Senior Accounting Manager	<b>June 2023</b>	The policy has been updated to remove the necessity for the card holder to give up their card when undertaking long-term absence, and replaced with an initial discussion with the finance team, who could hold onto a credit card until that employee's return.

### Policy Aims

<b>Name of Policy or practice</b>	Corporate Credit Card Policy
<b>New Policy or Revision</b>	Revision
<b>Name of Policy Owner</b>	Director of Finance & Corporate Services
<b>Date Policy Owner Confirmed Completion</b>	June 2023

<b>What is the rationale for this policy or practice?</b>
Corporate credit cards will only be issued to employees who satisfy the criteria for holding a corporate credit card and all expenditure incurred on a corporate credit card must be in accordance with the permitted use of a corporate credit card. We currently have 75 cards across the full of the SQA. This policy is in place to protect SQA's financial interests.
<b>What evidence is there to support the implementation or development of this policy or practice?</b>
This policy is developed in conjunction with our card providers, The Royal Bank of Scotland, and their rules and regulations. This policy also has financial misconduct implications – as those with SQA credit cards have more direct access to use of SQA funds. For related impacts, please see the, <a href="#">anti-bribery and corruption EqIA</a> .

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

This policy aims to ensure that:

- a facility is provided to assist in doing business, within Scotland, the rest of the UK and Internationally, providing flexibility when purchasing goods and services.
- credit cards are used to provide an easier means of booking or paying for expenditure where it has not been possible to pre-book or where conventional means of payment are not acceptable to the vendor.

credit cards are not used to avoid the necessary authorisation of expenditure for travel and/or expenses as set out in SQA's Travel & Expenses Policy

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

This policy relates to staff. The finance team do not collect diversity information on its card holders, so we cannot say which groups are or are not present. As such, we can assume all the equality groups are directly affected by the policy.

## Evidence, Consultation and Engagement

<b>What stakeholders have you engaged with in the development of this policy or practice?</b>
We have not yet engaged but plan to engage with the Unions and the Staff Network group. Feedback with these key stakeholder groups will be included in an updated EqIA at the EqIA review date, and the policy will be updated to reflect necessary changes.

<b>What evidence about equality groups do you have to support this assessment?</b>	
<b>Age</b>	No evidence was found to support an impact against age. SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.
<b>Disability</b>	<p>SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.</p> <p>In table 3.3 of the report “Barriers to employment and Unfair Treatment at Work”, the EHRC notes that 10% of employed disabled people and 26% of unemployed disabled people note “Difficulty with transport” as a limitation to working. This is higher than the reporting rates for non-disabled people (6% and 10% respectively). This indicates that working in a way that does not necessitate travel (including working from home) would mitigate that barrier.</p> <p><a href="https://www.equalityhumanrights.com/sites/default/files/research-report-88-barriers-to-employment-and-unfair-treatment-at-work-disabled-peoples-experiences.pdf">https://www.equalityhumanrights.com/sites/default/files/research-report-88-barriers-to-employment-and-unfair-treatment-at-work-disabled-peoples-experiences.pdf</a>.</p>
<b>Race</b>	No evidence was found to support an impact against race. SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.
<b>Religion or Belief</b>	No evidence was found to support an impact against religion or belief. SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.
<b>Sex</b>	No evidence was found to support an impact against sex. SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.
<b>Sexual Orientation</b>	No evidence was found to support an impact against sexual orientation. SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.
<b>Gender Re-assignment (Gender identity and transgender)</b>	<p>The Royal Bank of Scotland Additional Cardholder form for business credit cards outlines that cardholder details may be checked for fraud and money laundering. As such, cardholders are encouraged to use their legal name in the application. Although a cardholder’s legal name should be used in the application, there is a separate field for “Name on card”. This means that where a person’s legal name and common name differ, they can use their common name on their card.</p> <p><a href="https://www.business.rbs.co.uk/content/dam/royal_bank_of_scotland/business/credit-cards/documents/RBS_additional_cardholder_form.pdf">https://www.business.rbs.co.uk/content/dam/royal_bank_of_scotland/business/credit-cards/documents/RBS_additional_cardholder_form.pdf</a></p>

	<p>RBS has a process for changing the name of cardholders. Should a credit card holder change their legal name, the process is clearly set out. This may be relevant through transition, where a person changes their name by deed poll or through a gender recognition certificate.</p> <p>SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.</p>
<b>Marriage/Civil Partnership</b>	<p>The Royal Bank of Scotland Additional Cardholder form for business credit cards outlines that cardholder details may be checked for fraud and money laundering. As such, cardholders are encouraged to use their legal name in the application. Although a cardholder's legal name should be used in the application, there is a separate field for "Name on card". This means that where a person's legal name and common name differ, they can use their common name on their card. <a href="https://www.business.rbs.co.uk/content/dam/royal_bank_of_scotland/business/credit-cards/documents/RBS_additional_cardholder_form.pdf">https://www.business.rbs.co.uk/content/dam/royal_bank_of_scotland/business/credit-cards/documents/RBS_additional_cardholder_form.pdf</a></p> <p>RBS has a process for changing the name of cardholders. Should a credit card holder change their legal name, the process is clearly set out. This may be relevant following a marriage and change of legal name.</p> <p>SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.</p>
<b>Pregnancy / Maternity</b>	<p>SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.</p>
<b>Care experience (where relevant)</b>	<p>No evidence was found to support an impact against care experience. SQA does not collect diversity information of its card holders, due to the relatively small group size, and the risk of identification of an individual.</p>

## 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
	We record a neutral impact for this category as no evidence of positive or negative impact relating to age.
	Advance equality of opportunity
	We record a neutral impact for this category as no evidence of positive or negative impact relating to age.
	Foster good relations
	We record a neutral impact for this category as no evidence of positive or negative impact relating to age.
	Protected Characteristic
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

	<p>We mitigated a negative impact for those on long term leave (including disability or sickness absence). We removed the requirement to return the card and re-apply on return. These employees would need to re-apply for their corporate credit card on their return – a process which can take upwards of three weeks. Employees whose core role relies on the use of a corporate credit card would essentially be held back for this period while their new card was pending. Instead, now staff or their managers can let the finance team know that they are on long-term leave, and the finance team will securely store the corporate credit card. Positive impact is recorded.</p>
	Advance equality of opportunity
	<p>We believe we positively impact on the protected rights for this category which can be demonstrated by the recent change we have made to the policy around return of the card when leaving SQA employment. We have removed the necessity for the card to be delivered in person before leaving SQA and have added the option to post the card via secure mail. This mitigated the previous negative impact.</p>
	Action taken: above changes to policy made on review,
	Foster good relations
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Race</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>We record a neutral impact for this category as no evidence of positive or negative impact relating to race.</p>
	Advance equality of opportunity
	<p>We record a neutral impact for this category as no evidence of positive or negative impact relating to race.</p>

	Foster good relations
	We record a neutral impact for this category as no evidence of positive or negative impact relating to race.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Religion or Belief</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	We record a neutral impact for this category as no evidence of positive or negative impact relating to religion or belief.
	Advance equality of opportunity
	We record a neutral impact for this category as no evidence of positive or negative impact relating to religion or belief.
	Foster good relations
	We record a neutral impact for this category as no evidence of positive or negative impact relating to religion or belief.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Sex</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	We record a neutral impact for this category as no evidence of positive or negative impact relating to sex.



	Advance equality of opportunity
	We record a neutral impact for this category as no evidence of positive or negative impact relating to sex.
	Foster good relations
	We record a neutral impact for this category as no evidence of positive or negative impact relating to sex.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Sexual Orientation</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	We record a neutral impact for this category as no evidence of positive or negative impact relating to sexual orientation.
	Advance equality of opportunity
	We record a neutral impact for this category as no evidence of positive or negative impact relating to sexual orientation.
	Foster good relations
	We record a neutral impact for this category as no evidence of positive or negative impact relating to sexual orientation.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Gender Re-assignment (Gender identity and transgender)</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	We record a positive impact for this category, in regard to potential name changes the process is dictated by the card providers policies and we would offer support in ensuring this is as easy as possible to complete.

	Advance equality of opportunity
	We record a neutral impact for this category as no evidence of positive or negative impact relating to gender reassignment.
	Foster good relations
	We record a positive impact for this category, in regard to potential name changes the process is dictated by the card providers policies and we would offer support in ensuring this is as easy as possible to complete, this process may foster understanding between cisgender and trans employees.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>
<b>Marriage/Civil Partnership</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	There is no evidence that this policy could eliminate discrimination on the basis of marriage or civil partnership.
	Advance equality of opportunity
	We record a positive impact for this category as no evidence of positive or negative impact relating to marriage/civil partnership. In regard to potential name changes the process is dictated by the card providers policies and we would offer support in ensuring this is as easy as possible to complete.
	Foster good relations
	There is no evidence that this policy could foster good relations on the basis of marriage or civil partnership.
<b>Protected Characteristic</b>	<b>General Equality Duty</b>

<b>Pregnancy / Maternity</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Previously, this policy included a clause that stated that employees going on long-term leave (including maternity leave) would have their card returned. These employees would need to re-apply for their corporate credit card on their return – a process which can take upwards of three weeks. Employees whose core role relies on the use of a corporate credit card would essentially be held back for this period while their new card was pending. This has now been mitigated, as detailed in the “advancing equality of opportunity” section below.
	<b>Advance equality of opportunity</b>
	We believe we positively impact on the protected rights for this category which can be demonstrated by the recent change we have made to the policy around return of the card when going on long term leave (including maternity) and removing this requirement and adding that a discussion around the most relevant course of action being taken based on an individuals circumstances.
	Action taken: updated policy during this review.
	<b>Foster good relations</b>
	There is no evidence to support that this policy could effectively foster good relations between pregnant people and those who aren’t pregnant.
<b>Considered by SQA</b>	<b>General Equality Duty</b>
<b>Care experience (where relevant)</b>	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	We record a neutral impact for this category as no evidence of positive or negative impact relating to care experience.
	<b>Advance equality of opportunity</b>
	We record a neutral impact for this category as no evidence of positive or negative impact relating to care experience.
	<b>Foster good relations</b>
We record a neutral impact for this category as no evidence of positive or negative impact relating to care experience.	

**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.