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	Dec 2024	Additional Schedule Review Date	N/A

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

Required Actions	Owner	Date	Comment & Review
Actions taken to **monitor the implementation of policy and the impact on equality groups** (evidence and consultation)			**[ONGOING RECORD]**
These policies will be reviewed by the Information Governance Manager every 2 years, unless required sooner by operational or legislative change, to ensure that they remain fit for purpose. Updates will be made to the policy where necessary as a result of that review.	**Information Governance Manager**	**2024**	

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
Publication of policy and equality impact assessment	Advance equality of opportunity	**Information Governance Manager**	**Dec 2022**	
Communication of policy to staff.	Advance equality of opportunity Foster good relations	**Information Governance Manager**	**Dec 2022**	

Policy Aims

Name of Policy or practice	IT Acceptable Use Policy, Email Policy, and Access Control Policy
New Policy or Revision	Revision
Name of Policy Owner	Director of Finance and Corporate Services Information Governance Manager (policy author)
Date Policy Owner Confirmed Completion	November 2022

What is the rationale for this policy or practice?
These policies form part of a suite of policies to support the effective and safe use of SQA's IT systems and information held on these systems. Ensuring that the confidentiality, integrity and accessibility of SQA's information. The policies will be published on SQA's intranet ensuring it is available to all SQA staff. They should be read alongside other information governance policies.
What evidence is there to support the implementation or development of this policy or practice?

These policies have been developed in accordance with good practice guidance, legal requirements, and standards. These include:
- ◆ ISO/IEC 27001
- ◆ UK General Data Protection Regulation/Data Protection Act 2018
- ◆ National Cyber Security Centre guidance for public sector organisations
- ◆ Computer Misuse Act 1990
- ◆ The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000

What are the aims of this policy or practice?

- Email Policy - makes clear the permitted use of email and includes a wide range of examples of use which SQA would consider unacceptable.
- IT Acceptable Use Policy – sets out the conditions of acceptable use of SQA's IT assets to protect the confidentiality, integrity and availability of IT systems and information and SQA equipment.
- Access Control Policy – aims to ensure that the correct measures are in place to control access to SQA's information.

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

Information processed by SQA will include information relevant to equality groups.

Evidence, Consultation and Engagement

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

These policies were shared with representatives from SQA's unions (Unite and Unison) [feedback is pending] and consultation was undertaken with staff network groups.

[To date] No issues were identified to the policy owner in respect of the content or potential impact of the policy.

What evidence about equality groups do you have to support this assessment?	
Age **Disability** **Race** **Religion or Belief** **Sex** **Sexual Orientation** **Gender Re-assignment (Gender identity and transgender)** **Marriage/Civil Partnership** **Pregnancy / Maternity** **Care experience (where relevant)**	These policies form part of a suite of policies to support the effective and safe use of SQA's IT systems and information held on these systems. They are factual and procedural documents that set out clear requirements for SQA staff to work within regarding their access to and use of SQA's IT assets, including SQA's email system, and information. As a result, data or wider evidence is not captured, nor is wider monitoring of these policies undertaken on equality groups. They set out the requirements for the protection and safe use of SQA's information assets. The policies will be communicated to all SQA staff to make clear the requirements they must comply with and their responsibilities in relation to the protection of information and use of SQA's IT assets, including the email system.

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
	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups. The requirement to use a password as detailed in the Access Control Policy, could have a negative impact on some users within this equality group. However, passwords provide an important means for users to prove they are authorised to access SQA's information and information systems, protecting them against unauthorised access. Single sign on can be used on internal network systems unless security requirements dictate that further logins are required so this reduces the pressure on users to create and remember good passwords. Additionally, in the Access Control Policy, employees are directed to the Information Security Policy for additional information about passwords. This policy does not prohibit passwords being written down if they are stored securely. Other measures such as biometric access control would require the collection of additional special category data about users. It could therefore be inferred that these policies have a neutral or positive impact on users within this equality group.

	Advance equality of opportunity
	As these policies are aimed at supporting the effective and safe use of SQA's IT systems and information held on these systems, and no specific impacts have been identified, there is no further opportunity to advance equality for this equality group.
	Foster good relations
	No actions identified.
Protected Characteristic	**General Equality Duty**
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups. The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. The IT Acceptable Use policy also reflects that SQA equipment can be collected from a member of staff's home when/if it requires to be returned for any reason. It could therefore be inferred that these policies have a positive impact on users within this equality group. The requirement to use a password as detailed in the Access Control Policy, could have a negative impact on some users within this equality group. However, passwords provide an important means for users to prove they are authorised to access SQA's information and information systems, protecting them against unauthorised access. In the

	Access Control Policy, employees are directed to the Information Security Policy for additional information about passwords. This policy does not prohibit passwords being written down if they are stored securely. Other measures such as biometric access control would require the collection of additional special category data about users and would require to be considered in terms of cost. Additional forms of authentication would be deployed only where needed and would be subject to risk assessment. The format/content of these policy documents have been reviewed and amended for accessibility.
	Advance equality of opportunity
	As these policies are aimed at supporting the effective and safe use of SQA's IT systems and information held on these systems, and no specific impacts have been identified, there is no further opportunity to advance equality for this equality group.
	Foster good relations
	The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. It may be further inferred that by having policies in place which clearly set out this requirement, that it promotes understanding between others who may not share this protected characteristic in thus in doing so fosters good relations.
Protected Characteristic	**General Equality Duty**
Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

| | The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups.

The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. The IT Acceptable Use policy also reflects that SQA equipment can be collected from a member of staff's home when/if it requires to be returned, for any reason.

It could therefore be inferred that these policies have a positive impact on users within this equality group. |
|---|---|
| | Advance equality of opportunity |
| | As these policies are aimed at supporting the effective and safe use of SQA's IT systems and information held on these systems, and no specific impacts have been identified, there is no further opportunity to advance equality for this equality group. |
| | Foster good relations |
| | The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour.

It may be further inferred that by having policies in place which clearly set out this requirement, that it promotes understanding between others who may not share this protected characteristic in thus in doing so fosters good relations. |
| **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 |

	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups. The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. It could therefore be inferred that these policies have a positive impact on users within this equality group.
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	Foster good relations
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Protected Characteristic	**General Equality Duty**
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010

	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups. The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. It could therefore be inferred that these policies have a positive impact on users within this equality group.
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	Foster good relations
	The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. It may be further inferred that by having policies in place which clearly set out this requirement, that it promotes understanding between others who may not share this protected characteristic in thus in doing so fosters good relations.
Protected Characteristic	**General Equality Duty**

Sexual Orientation	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups. The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. It could therefore be inferred that these policies have a positive impact on users within this equality group.
	Advance equality of opportunity
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	Foster good relations
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Protected Characteristic	**General Equality Duty**

Gender Re-assignment (Gender identity and transgender)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
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Protected Characteristic	General Equality Duty

Marriage/Civil Partnership	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups. The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. It could therefore be inferred that these policies have a positive impact on users within this equality group.
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Protected Characteristic	**General Equality Duty**

Pregnancy / Maternity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups. The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour. It could therefore be inferred that these policies have a positive impact on users within this equality group.
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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
	The Access Control and IT Acceptable Use policies set out the controls and individual responsibilities for access to and use of SQA's information assets, therefore protecting their confidentiality, integrity and availability. Along with other associated policies, they aim to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, ensuring that SQA's information is accessed only by those authorised to do so. These policies and the associated requirements apply equally to all equality groups.
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	Foster good relations
	The Email Policy and the IT Acceptable Use Policy both make clear that any use of SQA assets to harass or bully others, to discriminate or encourage discrimination on racial or ethnic grounds, or on grounds of gender, sexual orientation, marital status, disability, political or religious beliefs, is considered unacceptable behaviour.
	It may be further inferred that by having policies in place which clearly set out this requirement, that it promotes understanding between others who may not share this protected characteristic in thus in doing so fosters good relations.

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.
No unjustified negative impacts have been identified.