

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 Scottish Qualifications Authority (SQA) through our actions the Action Plan will be the focus and record of ongoing actions.

Agreed Schedule Review Date	December 2024	Additional Schedule Review Date	
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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 monitor the implementation of policy and the impact on equality groups (evidence and consultation)			[ONGOING RECORD]
Regular stakeholder engagement	Customer Service Manager	1 June 2023	
Review of database showing when policy triggered	Customer Service Manager	1 June 2023	

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
[LIST]	[CROSS REFERENCE]			
Training – invisible disabilities	Eliminate Unlawful Discrimination	Customer Service Manager	01.06.23	
Implementation of a Call Record Management (CRM) system to allow us to record information which would identify a customer as vulnerable or in need of additional assistance (recorded with permission from customer).	Eliminate Unlawful Discrimination	Customer Service Manager	TBC – business wide decision	
Gender training, inclusivity	Eliminate Unlawful Discrimination	Customer Service Manager	01.06.23	
Behaviour recognition amongst vulnerable groups	Advance Equality of Opportunity, Eliminate Unlawful Discrimination	Customer Service Manager	01.06.23	
Availability of a translator	Advance Equality of Opportunity, Foster Good Relations	Customer Service Manager	01.06.23	

Policy Aims

Name of Policy or practice	Expected Behaviours Policy
New Policy or Revision	Revision
Name of Policy Owner	Customer Service Manager
Date Policy Owner Confirmed Completion	21.02.2023

What is the rationale for this policy or practice?

SQA receives enquiries, feedback and, from time to time, complaints regarding its products and services.

Occasionally, the behaviour or actions of individuals using our service makes it very difficult for us to deal with their query. In a small number of cases the actions of individuals are not what we would expect because they involve abuse of our staff or our process. When this happens, we must take action to protect our staff. We also consider the impact of the behaviour on our ability to do our work and provide a service to others. The Policy explains how we will approach these situations.

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

In the past, there has been no policy to support our staff when faced with particularly difficult customers. This lack of policy can make staff feel hesitant to take the appropriate action for fear of consequences. Having a policy will empower our staff to take the right action and to seek further support from management.

What are the aims of this policy or practice?

To ensure that we protect our staff from potential poor treatment by stakeholders calling into SQA at all times.

To ensure that our staff are aware of how we handle unacceptable behaviour and any actions that they need to take.

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

As the policy is designed to protect our staff and as our staff represent all equality groups, the aim of this policy is relevant. As the policy considers callers external to SQA, who may not necessarily be local to Scotland, and may not be SQA's learners, it is not practical to measure the demographics of SQA's callers. Instead, we focus below on evidence found for each group below contacting SQA.

Evidence, Consultation and Engagement

What stakeholders have you engaged with in the development of this policy or practice?	
None. The policy is centred on the expected behaviours of external stakeholders. SQA engage with them each day in conducting business, building a wealth of knowledge about dealing with external stakeholders within the team owning the policy.	
What evidence about equality groups do you have to support this assessment?	
Age	<p>Customer service: communication channels preferred by age 2018 Statista</p> <p>This evidence, published in 2022, found that preferred communication channels vary by age group. This was taken into consideration when evaluating our own impact on this protected characteristic.</p>
Disability	<p>How to Accommodate Callers With Disabilities (callcentrehelper.com) Disabled customers and call centres – Ofcom 55c9b50f80d28-guidelines-for-dealing-with-vulnerable-consumers-august-2015_55c9b50f80c7b.pdf (dma.org.uk)</p> <p>All the above evidence demonstrated that we need to consider a wide range of potential disabilities that may have an impact when having a telephone conversation, such as involuntary sounds and offensive language. We need to also understand that some disabilities can cause a person to react in a particular way, perhaps not what we would expect. This information has been used to help shape some actions that we can take to be more inclusive.</p>
Race	<p>ESL students in Scotland 2020 Statista</p> <p>This evidence demonstrated that over 52000 students in Scottish schools use a language other than English as the main language at home. But this does not mean they do not use or understand English language? This is something that we will need to consider when looking at accessibility (in broadest sense) of being able to contact SQA.</p>
Religion or Belief	No relevant evidence found on the relationship between religion or belief and contacting us as an organisation.
Sex	No relevant evidence found on the relationship between sex and contacting us as an organisation.
Sexual Orientation	No relevant evidence found on the relationship between sexual orientation and contacting us as an organisation.

Gender Reassignment (Gender identity and transgender)	<p>Handling Telephone Calls – Gender Identity Research & Education Society (gires.org.uk)</p> <p>This article looked at the issue of mis-gendering and the impact it can have. With over 1% of the population having gender reassignment as a protected characteristic, there is evidence to suggest we need to train our staff to be more aware and to help them understand how to handle these calls.</p>
Marriage/Civil Partnership	<p>No relevant evidence found on the relationship between marriage/civil partnership and contacting us as an organisation.</p>
Pregnancy / Maternity	<p>No relevant evidence found on the relationship between pregnancy/maternity and contacting us as an organisation.</p>
Care experience (where relevant)	<p>https://www.bps.org.uk/sites/www.bps.org.uk/files/Policy/Policy%20-%20Files/Supporting%20care-experienced%20children%20and%20young%20people%20during%20the%20Covid-19%20crisis%20and%20its%20aftermath.pdf</p> <p>This research looked at the behaviours of Care Experienced learners and found that their behaviour, may at times be more challenging. We acknowledge that not all Care Experienced learners will act the same, but we must be “care aware”. This evidence supported the need to provide additional training to staff to be aware of these situations and to show more patience.</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	<p data-bbox="483 628 696 659">Positive impact.</p> <p data-bbox="483 695 2018 828">All customers regardless of age will be able to contact SQA as required with no predicted adverse impact upon the protected characteristic of age. This policy will help to promote equality of opportunity across our customers. Evidence suggests that preferred communication channels vary by age group, however SQA offer a multi-channel approach to contacting us, thus promoting equality of opportunity.</p> <p data-bbox="483 865 2002 930">Any customers in a younger age group, who require support from a parent or carer, will be supported appropriately in line with their request.</p> <p data-bbox="483 967 1794 997">No further action needed as this policy and procedure applies equally to all people regardless of age.</p>
Protected Characteristic	General Equality Duty
Disability	<p data-bbox="483 1201 696 1232">Positive impact.</p> <p data-bbox="483 1268 2033 1334">All customers regardless of disability will be able to contact SQA as required with no predicted adverse impact upon the protected characteristic of disability. This policy will help to promote equality of opportunity across our customers.</p>

	<p>Customers with disabilities who require reasonable adjustments to effectively engage with SQA, will be supported in these adjustments where reasonable and proportionate, promoting equality of opportunity.</p> <p>Consideration of conditions that may cause a person to make involuntary sounds, which may include words and phrases that can be taken as offensive to some must be taken into account. It could be reasonably expected that any such individual is experienced in explaining such conditions at the start of communications with organisations, which would allow a SQA member of staff to determine their application of this policy. This will be assessed on a case-by-case basis, and the most appropriate solution will be sought for customers. This will help to eliminate unlawful discrimination, victimisation and harassment across our customers.</p> <p>It must also be considered that some disabilities can cause a person to act/react in a particular way. While it may not be obvious from the start, it would be appropriate for a member of staff to raise the concern and initiate the first stages of this policy. This in turn may generate opportunity for an open dialogue about the specific nature of a particular disability that can affect temperament and allow the staff member to be sensitive to such situations and make judgements on the application of this procedure. This will be assessed on a case-by-case basis, and the most appropriate solution will be sought for customers. This will help to eliminate unlawful discrimination, victimisation and harassment across our customers.</p> <p>We could consider some training around “invisible” disabilities and how we may help our customer service team both recognise and manage them.</p> <p>We would also benefit from a CRM system which would allow us to record information which would identify a customer as vulnerable or in need of additional assistance (recorded with permission from customer).</p>
Protected Characteristic	General Equality Duty
Race	<p>Positive impact.</p> <p>All customers regardless of race will be able to contact SQA as required with no predicted adverse impact. This policy applies equally to all people regardless of their race and this policy will help to promote equality of opportunity across our customers.</p>

	There may be a need for a translator if a customer is unable to communicate in English (if English is not their first language). This is not something that the SQA currently have a database of and may be worthwhile to investigate this across the organisation.
Protected Characteristic	General Equality Duty
Religion or Belief	
	Positive impact. All customers regardless of religion or belief will be able to contact SQA as required with no predicted adverse impact. This policy applies equally to all people regardless of their religion or belief and this policy will help to promote equality of opportunity across our customers.
	No further action needed as this policy and procedure applies equally to all people regardless of religion or belief.
Protected Characteristic	General Equality Duty
Sex	
	Positive impact. All customers regardless of sex will be able to contact SQA as required with no predicted adverse impact. This policy applies equally to all people regardless of their sex and this policy will help to promote equality of opportunity across our customers.
	No further action needed as this policy and procedure applies equally to all people regardless of sex.
Protected Characteristic	General Equality Duty

Sexual Orientation	<p>Positive impact.</p> <p>All customers regardless of sexual orientation will be able to contact SQA as required with no predicted adverse impact. This policy applies equally to all people regardless of their sexual orientation and this policy will help to promote equality of opportunity across our customers.</p>
	<p>No further action needed as this policy and procedure applies equally to all people regardless of sexual orientation.</p>
Protected Characteristic	General Equality Duty
Gender Reassignment (Gender identity and transgender)	<p>Positive impact.</p> <p>All customers regardless of gender reassignment will be able to contact SQA as required with no predicted adverse impact upon the protected characteristic.</p> <p>Consideration will need to be given to candidates who may contact us with a different name to that held on SQA records, this will be handled in a sensitive manner and guidance to customer given. This policy will help to foster good relations for our customers.</p> <p>Consideration may need to also be given to candidates whose gender identity may not be clear. Training for staff in this area will help navigate this.</p>
	<p>We could consider some training around gender reassignment and how to navigate a call where the gender status is unclear. We can consider how we help our customer service team both recognise and manage these calls.</p> <p>We would also benefit from a CRM system which would allow us to record information which would identify a customer having a protected characteristic in need of additional assistance (recorded with permission from customer).</p>
Protected Characteristic	General Equality Duty

Marriage/Civil Partnership	<p>Positive impact.</p> <p>All customers regardless of marital/civil partnership status will be able to contact SQA as required with no predicted adverse impact. This policy applies equally to all people regardless of their marital/civil partnership status and this policy will help to promote equality of opportunity across our customers.</p>
	<p>No further action needed as this policy and procedure applies equally to all people regardless of marital/civil partnership status.</p>
Protected Characteristic	General Equality Duty
Pregnancy / Maternity	
	<p>Positive impact.</p> <p>All customers regardless of pregnancy or maternity will be able to contact SQA as required with no predicted adverse impact. This policy applies equally to all people regardless of their pregnancy or maternity status and this policy will help to promote equality of opportunity across our customers.</p>
	<p>No further action needed as this policy and procedure applies equally to all people regardless of pregnancy or maternity status.</p>
Considered by SQA	General Equality Duty
Care experience (where relevant)	
	<p>Positive impact.</p> <p>All customers regardless of Care Experience will be able to contact SQA as required with no predicted adverse impact upon the protected characteristic.</p> <p>However, it SQA recognises that Care Experienced children and young people may be among the most vulnerable in society which may present behaviours that can seem challenging or viewed as being unacceptable, particularly when engaging with education systems. Where staff members become aware of the care experience status of a customer, consideration of this should be given when dealing with that person. This will help to eliminate unlawful discrimination,</p>

	victimisation and harassment across our customers and also help to promote equality of opportunity across our customers
	We could consider some training around how we help our customer service team both recognise and manage these calls.
	We would also benefit from a CRM system which would allow us to record information which would identify a customer having a protected characteristic in need of additional assistance (recorded with permission from customer).

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.
Not applicable