

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.

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| Agreed Schedule Review Date | Dec 2024 | Additional Schedule Review Date | N/A |
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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] |
| This policy will be reviewed by the Information Governance Manager every 2 years, unless required sooner by operational or legislative change, to ensure that it remains fit for purpose. Updates will be made to the policy where necessary as a result of that review. | Information Governance Manager | 2024 | |
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| 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 | |
| Amendment to policy text to reflect the impact on individuals of an information security breach | Advance equality of opportunity | Information Governance Manager | Nov 2022 | Complete – see section 7. |
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Policy Aims

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| Name of Policy or practice | Information Security 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? |
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| <p>Information security is an integral part of information management. SQA is committed to protecting the security of its information and information systems to ensure that</p> <ul style="list-style-type: none"> ◆ the integrity of SQA's information is maintained, so that it is accurate and fit for purpose ◆ information is available to those who need it and there is no disruption to SQA's business |

- ◆ confidentiality is not breached, and SQA's information is accessed only by those authorised to do so
- ◆ SQA complies with its legal obligations, including those applicable to personal data under data protection legislation

This policy provides a framework for the management of information security across SQA. Along with associated SQA policies, it supports the effective and safe use of SQA's information and information systems. It outlines SQA's overall approach to information security, explaining the controls to keep SQA's information secure, and users' individual responsibilities for implementing and complying with these controls.

The policy will be published on SQA's intranet ensuring it is available to all SQA staff. It should be read alongside SQA's Data Protection Policy which sets out the requirements for processing personal data.

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

This policy has 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
- ◆ Scottish Government cyber resilience strategy
- ◆ Computer Misuse Act 1990
- ◆ The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000

What are the aims of this policy or practice?

This policy:

- ◆ provides a framework for the management of information security across SQA
- ◆ aims to implement controls to ensure that the confidentiality, integrity and availability of SQA information and information systems is protected from internal and external threats
- ◆ aims to ensure all SQA appointed users of information comply with these controls and understand their responsibilities.

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

Information processed by SQA and held on SQA information systems 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? |
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| <p>This policy was shared with representatives from SQA's unions (Unite and Unison) [feedback pending] and consultation was undertaken with staff network groups.</p> <p>[To date] No issues were identified to the policy owner in respect of the content or potential impact of the policy.</p> <p>Information has previously been gathered from colleagues across SQA on the use of information and information systems which has informed this policy.</p> |

| What evidence about equality groups do you have to support this assessment? | |
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| <p>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)</p> | <p>This policy acts as a framework for the management of information security. As a result, data or wider evidence is not captured nor wider monitoring of this policy undertaken on equality groups. This policy sets out the requirements for the protection and safe use of SQA's information and information systems.</p> <p>The policy 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.</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 |
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| Age | Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010 |
| | <p>The policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> |
| | <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> |
| | <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |
| | Advance equality of opportunity |

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| | Foster good relations |
| Protected Characteristic | General Equality Duty |
| Disability | <p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> <p>The format/content of the policy has been reviewed and amended for accessibility.</p> <p>The requirement to use passwords to access SQA systems 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. The policy does not prohibit passwords being written down if they are stored securely.</p> |

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| | <p>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.</p> <p>The requirement to dispose of paper copies of information using facilities in SQA's offices may also have a negative impact on some users within this equality group. Any physical copies of SQA information must be appropriately and securely disposed of and the same level of security cannot be achieved were disposal to be undertaken in a user's home or at another location.</p> <p>The need to protect SQA's information justifies this potential negative impact.</p> <p style="text-align: center;">Advance equality of opportunity</p> <p style="text-align: center;">Foster good relations</p> |
| Protected Characteristic | General Equality Duty |
| Race | <p style="text-align: center;">Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for</p> |

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| | <p>processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |
| | <p>Advance equality of opportunity</p> |
| | <p>Foster good relations</p> |
| <p>Protected Characteristic</p> | <p>General Equality Duty</p> |
| <p>Religion or Belief</p> | <p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |

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| | Advance equality of opportunity |
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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 |
| | <p>The policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |
| | Advance equality of opportunity |
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| | Foster good relations |
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| 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 policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |
| | Advance equality of opportunity |
| | Foster good relations |
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| Protected Characteristic | General Equality Duty |
| Gender Re-assignment | Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010 |

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| (Gender identity and transgender) | <p>The policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |
| | Advance equality of opportunity |
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| | Foster good relations |
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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 |

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| | <p>The policy explains SQA's framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA's information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |
| | Advance equality of opportunity |
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| | Foster good relations |
| Protected Characteristic | General Equality Duty |
| Pregnancy / Maternity | Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010 |

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| | <p>The policy explains SQA’s framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA’s information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> <p>The processing of personal data related to this Protected Characteristic is also covered by the Data Protection Policy and Processing Special Category and Criminal Offence Data Policy. These policies make clear the requirements for processing personal, special category and criminal offence data to ensure they are appropriately protected. Users must comply with all these policies.</p> <p>It could be inferred that this policy, along with other related policies, has a positive impact on this equality group by putting in place controls to protect information related to this protected characteristic.</p> |
| | Advance equality of opportunity |
| | Foster good relations |
| Considered by SQA | General Equality Duty |
| Care experience (where relevant) | <p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The policy explains SQA’s framework (controls and individual responsibilities) to protect the confidentiality, integrity and availability of SQA information and information systems. It aims to ensure that all information, including that related to this protected characteristics/equality group, is appropriately protected, including protecting the confidentiality of this information and ensuring SQA’s information is accessed only by those authorised to do so. Therefore, reducing the likelihood/risk of a breach of information security. This policy and the associated requirements apply equally to all equality groups.</p> |

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| | Advance equality of opportunity |
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| | Foster good relations |

Rationale

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| <p>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.</p> |
| <p>The need to bring information into the office to be disposed of securely is an important security feature to protect information and to demonstrate the importance that SQA places on all of its information. Any issues that employees have in fulfilling their role due to hybrid working must be discussed with their line manager in order to find a solution.</p> |