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	2024 – exact date will be agreed based on policy approval date	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]**
This policy will be reviewed after 6 months and then yearly, unless required sooner 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	
The Disability Network requested that links be added in the introduction to the policy to references to Article 10 of the European Convention on Human Rights and the Code of Conduct.	Information Governance Manager	Sept 2023	Links have been added
The Disability Network requested that the abbreviation for Trade Unions (TU) be added to ensure understanding.	Information Governance Manager	Sept 2023	This has been added.
The Disability Network asked if there should be specific reference to LinkedIn in the policy.	Information Governance Manager	Sept 2023	Section 6.2 covers professional activity. Naming specific sites and their uses were considered as part of the TU consultation process. It was felt that a broader approach to the policy would suit better and stops the policy from becoming out of date should things change. For example, Twitter is now X; if listed in the policy, it would be out-of-date now.
The Disability Network highlighted the colour contrast in some images in the EqIA document made them difficult to read.	Information Governance Manager	Sept 2023	The images used were taken from the *SQA's Equalities 2023 Mainstreaming Report. Issues with contrast in this report were not picked up at the time and it is not possible for the policy author to make changes to the pie charts.*

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

Policy Aims

Name of Policy or practice	Social Media for Personal Use Policy v1.0
New Policy or Revision	New
Name of Policy Owner	Director of Finance and Corporate Services Information Governance Manager (policy author)
Date Policy Owner Confirmed Completion	TBA

What is the rationale for this policy or practice?
According to Percy, Hughes & Roberts who provide employment law services to UK firms, there are 45 million social media users in the UK, which equates to around 66% of the population using online platforms. This policy sets out to provide clarity on SQA's expectations around the acceptable and unacceptable use of social media by all users who are employed directly by SQA, or who have been contracted to deliver services on behalf of SQA. The policy will be published on SQA's intranet ensuring it is available to all SQA staff and consultants. It will also be communicated to suppliers who provide consultants and agency workers to ensure that individuals who carry out work for SQA via procurement contracts are aware of SQA's requirements.

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

As identified in the Equality Impact Assessment for the Dignity at Work Policy there is insufficient data collected relating to the protected characteristics of people taking part in exit interviews.

There is a wide range of articles written by employment law solicitors and learning and development experts freely available. These articles encourage employers to put in place a social media policy so that members of staff who post any type of content online are made aware of the potential consequences of breaching such a policy. Some examples have been provided.

Don't ignore the role of social media in workplace bullying

The Negative Effects of Social Media in the Workplace

25 Problems with Social Media in the Workplace

Social Media in the Workplace

Social Media in the Workplace – A Guide for Employers

What are the aims of this policy or practice?

The purpose of this policy is to:
- ◆ protect SQA's reputation.
- ◆ provide clarity on the standards expected of SQA employees and others contracted to work with SQA in relation to the use of social media for personal use.
- ◆ set expectations for appropriate behaviours for SQA and those contracted to deliver services on behalf of SQA; and
- ◆ set expectations for employees' social media activities to ensure that SQA is not exposed to legal or reputational damage.

This policy is not just aimed at employees. It is aimed at ensuring that employees, contracted workers, SQA customers, suppliers and stakeholders should experience a standard of behaviour online as would be expected in non-online settings, as per the SQA Code of Conduct.

Related Policies:

This policy signposts individuals to other SQA policies that may be more appropriate, for example,

- ♦ Code of Conduct
- ♦ Dignity at Work Policy
- ♦ Grievance Policy
- ♦ Whisteblowing Policy

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

There is national evidence to suggest that people who share certain 'Protected Characteristics' are, on balance, more likely to disproportionately experience bullying, harassment, and discrimination. The aims of this policy are therefore of great significance to any of our staff, customers, suppliers, or stakeholders who share any of the protected characteristics.

Evidence, Consultation and Engagement

What stakeholders have you engaged with in 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 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
- ♦ Parent & Carers Network.
- ♦ Young Talent
- ♦ Men's Sheds

No issues were identified in respect of the content or potential impact of the policy.

	What evidence about equality groups do you have to support this assessment?
Age	The table below shows the comparison between SQA colleagues in different age groups and the Scottish working population (those aged 16 to 74).

| Age	SQA	Population of Scotland[1]
16-24	3.47%	10.18%
25-29	10.14%	6.77%
30-39	23.07%	13.56%
40-49	26.45%	12.24%
50-59	23.94%	14.44%
60-64	9.85%	6.58%
65+	3.09%	10.87%

People of certain age groups are, on balance, at a greater risk of experiencing Age Discrimination than others.

Research from the Department for Work and Pensions' (DWP), 'Attitudes to Age in Britain', Measuring attitudes to age in Britain (WP90) - GOV.UK (www.gov.uk) found that one-third of respondents had experienced age discrimination in the past year, and younger respondents aged under 25 were at least twice as likely as all other age groups to have experienced age prejudice.

Both young and older workers have experienced harassment and discrimination at work. Social media can create a bullying/harassment culture, something that has been widely documented particularly in school age and younger people. What is online bullying? (anti-bullyingalliance.org.uk) for example noted that 24% of younger people in the UK will experience online bullying.

Source: SQA's Equalities 2023 Mainstreaming Report
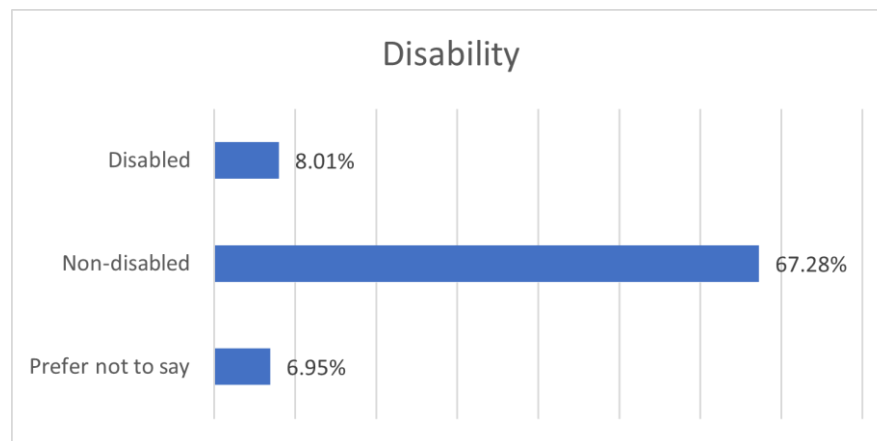
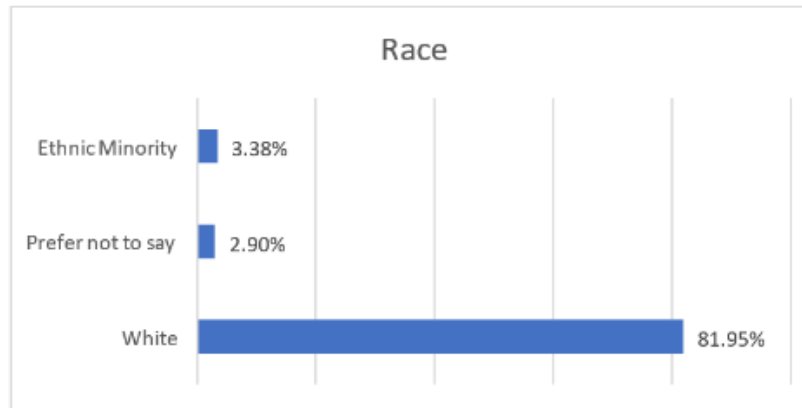| Disability	
	Disability
	  Disabled 8.01% Non-disabled 67.28% Prefer not to say 6.95%
	32% of the adult population in Scotland are disabled. Disclosing disability information is voluntary and, as of 30 November 2022, 82.24% of colleagues had completed information in relation to this protected characteristic. *Source: SQA's Equalities 2023 Mainstreaming Report*

Race	
According to the Scottish Surveys Core Questions 2019 (Last updated: January 2021), 5% of the adult population in Scotland were minority ethnicity[1].

The majority of SQA colleagues (88.22%) have provided data regarding their ethnicity.
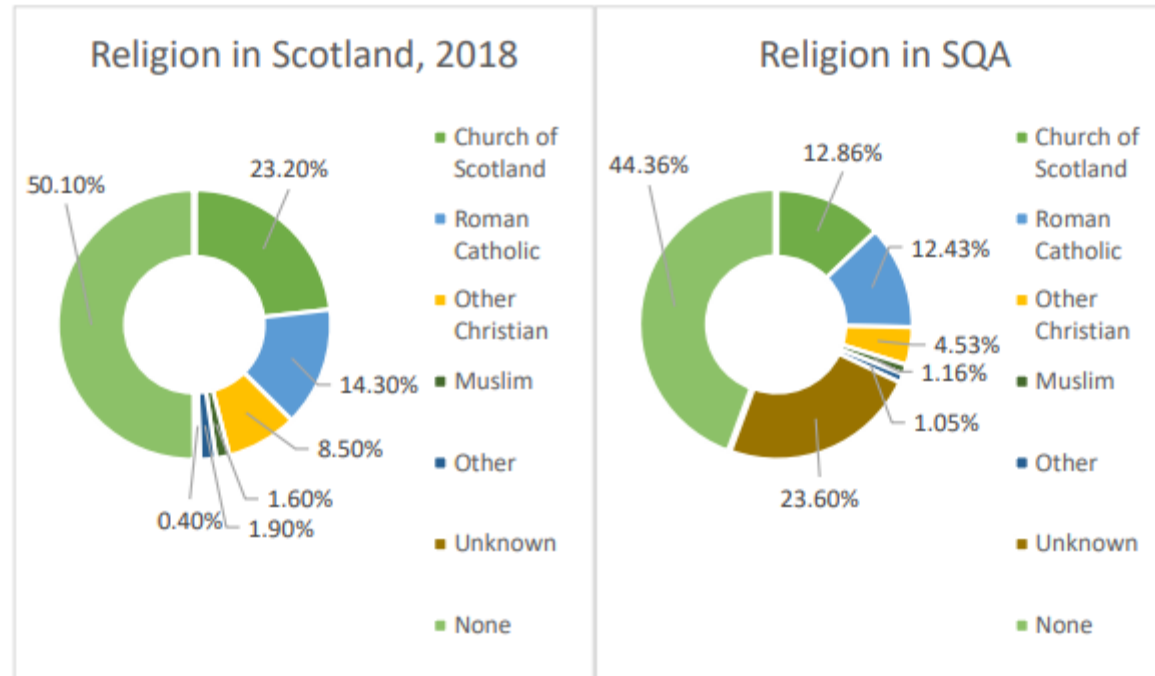
Colleague data shows that SQA has a slightly lower level of diversity across its workforce when compared to the Scottish population more generally.

There has been a 0.22 % increase in the number of ethnic minority colleagues from 3.16% in 2020 to 3.38% in 2022. This slight increase is due to recruitment of ethnic minority staff. The largest Ethnic Minority group at SQA is Asian, Scottish Asian, or British Asian.

Source: SQA's Equalities 2023 Mainstreaming Report |

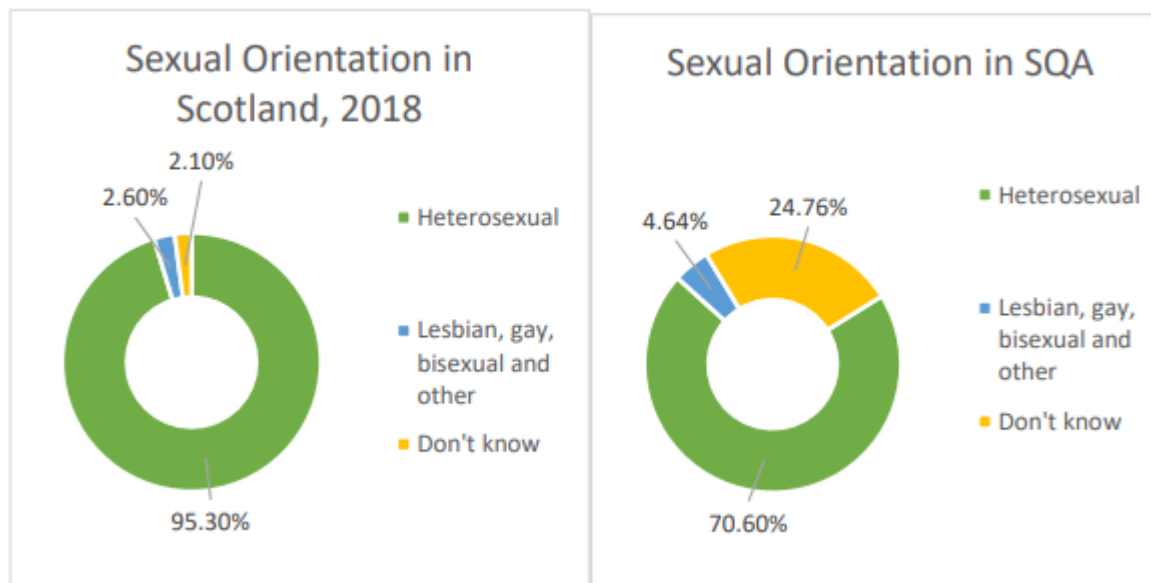| Religion or Belief	
	Religion or belief Religion in Scotland, 2018 — Religion in SQA Church of Scotland, Roman Catholic, Other Christian, Muslim, Other, Unknown, None Religion in Scotland, 2018: 50.10%, 23.20%, 14.30%, 8.50%, 1.90%, 1.60%, 0.40% Religion in SQA: 44.36%, 12.86%, 12.43%, 23.60%, 4.53%, 1.16%, 1.05% *Source: SQA's Equalities 2023 Mainstreaming Report* The majority of colleagues (88.13%) have provided data regarding their religion or belief. The diversity of religion and belief broadly mirrors that of the population of Scotland.

|	
Sex	51% of Scotland's population are female and 49% male. In SQA: ♦ 63% of colleagues are women and 37% are men. ♦ The Head of Service group has 14 women (41%) and 20 men (59%). ♦ The Executive Management Team (EMT) has 6 females (60%) and 4 men (40%). *Source: SQA's Equalities 2023 Mainstreaming Report*
Sexual Orientation	 81.76% of colleagues at SQA have chosen to disclose their sexual orientation.

	Our workforce has double the representation of the overall Scottish population self-identifying as lesbian, gay, bisexual or in another way. The proportion of colleagues identifying as heterosexual is below national indicators, and the proportion of our workforce whose sexual orientation is unknown is just over ten times the national indicator. *Source: SQA's Equalities 2023 Mainstreaming Report*
Gender Re-assignment (Gender identity and transgender)	No equality profiling data is currently captured by SQA. National Equality Risks: Research from LGBT in Scotland - Work Report (stonewallscotland.org.uk) in 2018 highlights that: - Two in five (40 per cent) trans employees have experienced negative comments or conduct from customers or clients - Trans staff tend to experience higher levels of negative comments or conduct, with two in five experiencing it from colleagues (39 per cent). 6 per cent have been physically attacked by customers or colleagues in the last year because of their sexual orientation or gender identity. *Source: Dignity at Work Policy Equality Impact Assessment v1.0*

Marriage/Civil Partnership	
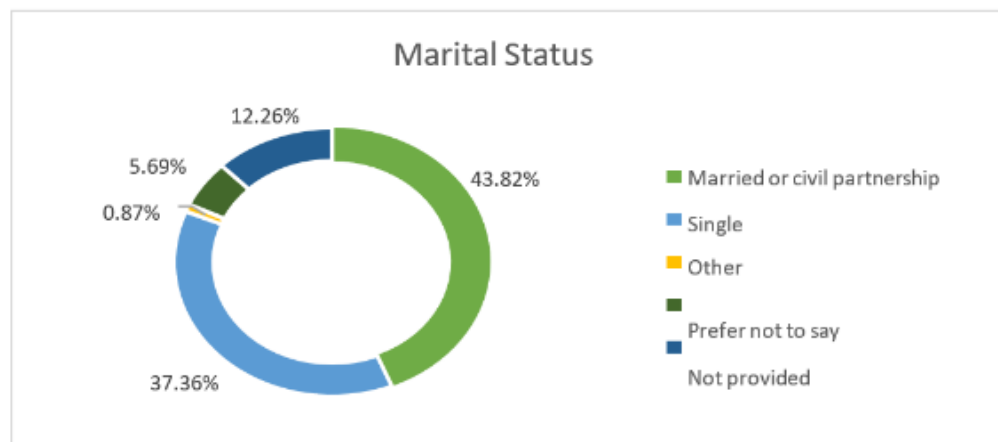
87.74% of colleagues have provided marital status information. 42.28% of colleagues are married or in a civil partnership and 37.36% are single.

Source: SQA's Equalities 2023 Mainstreaming Report

Pregnancy / Maternity	

	Colleagues		
Pregnancy Status	**2019**	**2020**	**Variance**
Not Pregnant	98.25%	98.95%	**0.70%**
Pregnant	1.75%	1.05%	**-0.70%**
Total	**100.00%**	**100.00%**	

In 2019 1.75% of colleagues were pregnant, in 2020 this figure reduced to 1.05%, found at Table 1.20: Colleagues by pregnancy status workforce-equality-monitoring-report-2019-2021.pdf (sqa.org.uk)

Source: SQA Workforce Equality Monitoring Report 2019-21

	'One in five mothers said they had experienced harassment or negative comments related to pregnancy or flexible working from their employer and /or colleagues; if scaled up to the general population this could mean as many as 100,000 mothers a year'. Pregnancy and maternity discrimination research findings | Equality and Human Rights Commission (equalityhumanrights.com) *Source: SQA Workforce Equality Monitoring Report 2019-21*
Care experience (where relevant)	No equality profiling data is currently captured by SQA.

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 policy explains the standards of behaviour expected of all SQA staff and other contracted workers. These standards apply to everyone. This policy should have a **positive impact** on all employees and contracted workers as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised. However, overall risks of Age discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect *Age* related profiling data relating to incidents or experiences. **Positive and Negative Impacts Recorded.**
	Advance equality of opportunity
	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.
	Foster good relations

Protected Characteristic	General Equality Duty		
	Improved data collection should help to identify any issues in the future.		
Protected Characteristic	**General Equality Duty**		
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010		
	The policy explains the standards of behaviour expected of all SQA staff and other contracted workers.		
	These standards apply to everyone.		
	This policy should have a **positive impact** on both disabled and non-disabled employees and contracted workers as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised.		
	However, overall risks of Disability discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect Disability related profiling data relating to incidents or experiences.		
	Positive and Negative Impacts Recorded.		
	Advance equality of opportunity		
	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.		
	Foster good relations		
	Improved data collection should help to identify any issues in the future.		
Protected Characteristic	**General Equality Duty**		

Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The policy explains the standards of behaviour expected of all SQA staff and other contracted workers. These standards apply to everyone. This policy should have a **positive impact** on employees and contracted workers of all nationalities, citizenships, and ethnicities (Race) as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised. However, overall risks of Race discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect Race related profiling data relating to incidents or experiences. **Positive and Negative Impacts Recorded.**
	Advance equality of opportunity
	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.
	Foster good relations
	Improved data collection should help to identify any issues in the future. The **ACE** Network exists to foster good relations, provide support, create an overall sense of belonging that may not exist elsewhere in the organisation. It also exists with the aim of sharing experiences, providing feedback and recommendations as to how SQA can promote a more diverse and inclusive workplace. Measuring the impact of this policy with this group will help SQA understand if there are any issues and opportunities to raise awareness and improve on the policy generally.

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 policy explains the standards of behaviour expected of all SQA staff and other contracted workers. These standards apply to everyone. This policy should have a **positive impact** on employees and contracted workers of all nationalities, citizenships, and ethnicities (Race) as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised. However, overall risks of Race discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect Race related profiling data relating to incidents or experiences.
	Advance equality of opportunity
	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.
	Foster good relations
	Improved data collection should help to identify any issues in the future.

Protected Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The policy explains the standards of behaviour expected of all SQA staff and other contracted workers. These standards apply to everyone. This policy should have a **positive impact** on employees and contracted workers of all sexes as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised. However, overall risks of Sex discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect Sex related profiling data relating to incidents or experiences.
	Advance equality of opportunity
	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.
	Foster good relations
	Improved data collection should help to identify any issues in the future. In SQA the Women's network 'provides a welcoming space for women across the organisation. Through open meetings and events there are opportunities to get to know one another, offer and receive support, and influence SQA policy development in areas of equality and inclusion. The Women's Network should be asked for their views on the impact of this 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
	The policy explains the standards of behaviour expected of all SQA staff and other contracted workers. These standards apply to everyone. This policy should have a **positive impact** on employees and contracted workers of all Sexual Orientations as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised. However, overall risks of Sexual Orientation discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect Sexual Orientation related profiling data relating to incidents or experiences.
	Advance equality of opportunity
	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.
	Foster good relations
	Improved data collection should help to identify any issues in the future. The *Rainbow Network* is SQA's LGBTQ+ colleague network. They are 'part of a vibrant global movement for change made up of LGBTQ+ people and our allies. The Rainbow Network should be asked for their views on the impact of this policy.

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
	The policy explains the standards of behaviour expected of all SQA staff and other contracted workers.
	These standards apply to everyone.
	This policy should have a **positive impact** on employees and contracted workers of all Gender Identities as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised.
	However, overall risks of Gender Identity discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect Gender Identity related profiling data relating to incidents or experiences.
	Advance equality of opportunity
	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.
	Foster good relations
	Improved data collection should help to identify any issues in the future.
	The *Rainbow Network* is SQA's LGBTQ+ colleague network. They are 'part of a vibrant global movement for change made up of LGBTQ+ people and our allies. The Rainbow Network should be asked for their views on the impact of this policy.

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
	Except for being harassed or discriminated against because an employee is in a same sex relationship (ref sexual orientation), we can identify no other potential equality risks. **A neutral impact has been recorded for this characteristic.**
	Advance equality of opportunity
	N/A
	Foster good relations
	N/A
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 policy explains the standards of behaviour expected of all SQA staff and other contracted workers. These standards apply to everyone. This policy should have a **positive impact** on employees and contracted workers on the grounds of Pregnancy or Maternity as the policy clearly defines SQA aims and how to raise a concern if these aims are not being realised. However, overall risks of Pregnancy/Maternity discrimination in SQA cannot be accurately identified, eliminated nor discounted as SQA does not currently collect Pregnancy/Maternity related profiling data relating to incidents or experiences.
	Advance equality of opportunity

	Developing a clear policy and supporting process should ensure that staff will feel raise concerns about postings on social media. Thus, indirectly, creating a positive working environment which enables all staff to raise concerns without the fear of victimisation.
	Foster good relations
	Improved data collection should help to identify any issues in the future.
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
	Whilst there is currently no evidence to suggest that care experience colleagues are placed at a disadvantage compared to other colleagues (or vice versa), it is recommended that data is collected and an analysis, by care experience, be performed of the 'lifecycle' of colleagues to identify any adverse trends.
	Advance equality of opportunity
	N/A
	Foster good relations
	N/A

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.