# 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	August 2024	Additional Schedule Review	
		Date	

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</b> <b>policy and the impact on equality groups</b> (evidence and consultation)			[ONGOING RECORD]
Succession Planning Board	OD & Change Manager	September 2024	Consider the implementation of a succession board as part of the new Qualifications Body. This will look to have a diverse group of colleagues consider suitability of successors across the organisation.
Equality and Diversity education	OD & HR & Reward		Work with our newly appointed ED&I Manager in HR Reward to review succession and the education needed for staff and managers in SQA. Work alongside our HR Colleague who also identified this as an action from their EQIA work
SQA adds <i>Gender Identity</i> (i.e. people who identify as more than one gender or none) to all future Equality Monitoring reporting.	HR Reward Manager	N/A - part of HR action plan	This has already been identified through the HR EQIAs as an action and will be address by our reward team.

**Policy Aims** 

Name of Policy or practice	Succession Planning
New Policy or Revision	Revision
Name of Policy Owner	Head of OD & Change
Date Policy Owner Confirmed Completion	13/02/2023

What is the rationale for this policy or practice? Succession planning strengthens the overall capability of SQA and minimises risk for critical roles in our organisation by identifying critical positions and highlighting potential resourcing issues. It allows Leaders to focus development of individuals to meet future business needs.

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

CIPD Practice states "Succession planning focuses on identifying and growing talent to fill leadership and business critical positions in the future. In the face of skills shortages, succession planning has gained popularity, and is now carried out in both large and smaller organisations. https://www.cipd.co.uk/knowledge/strategy/resourcing/succession-planning-factsheet#gref

Turnover stats

Turnover Stats for SQA

# Leavers



The reduction in leavers can be attributed to several reasons. However, it is reasonable to assume that general slowdown of the employment market relating to the economic impacts of Covid-19 could have contributed to this.

The voluntary labour turnover rate in 2020 was 12.4% (XpertHR annual survey).

Equality Monitoring Report 2019-2021 – breakdown of protected characteristics

Protected characteristics	Gender (Sex)	Age	Relationship status	Race	Disability	Sexual Orientation	Identify as Transgender	Religion or belief
Completed	100.00%	100.00%	86.24%	87.04%	83.99%	83.35%	84.61%	86.73%
Not	0%	0%	13.76%	12.96%	16.02%	16.02%	15.38%	13.28%
Completed								

Colleagues in SQA by Grade

Grade	2019	2020	Variance
1	1.93%	1.90%	-0.03%
3	7.07%	6.32%	-0.75%
4	18.97%	17.91%	-1.06%
5	8.68%	9.59%	0.91%
6	21.01%	20.65%	-0.35%
7	17.58%	18.02%	0.44%
8	21.22%	22.44%	1.22%
HOS	3.54%	3.16%	-0.38%
Total	100.00%	100.00%	

## Colleagues by Gender

Gender (Sex)	2019	2020	Variance
Female	61.20%	61.64%	0.44%
Male	38.80%	38.36%	-0.44%
Total	100.00%	100.00%	

Age	2019	2020	Variance
band			
16-24	6.32%	5.27%	-1.05%
25-29	6.97%	6.32%	-0.64%
30-34	13.18%	11.49%	-1.70%
35-39	14.04%	15.28%	1.24%
40-44	13.83%	14.23%	0.40%
45-49	12.43%	11.06%	-1.37%
50-54	13.40%	14.86%	1.46%
55-59	12.75%	12.33%	-0.43%
60-64	5.68%	7.59%	1.91%
65+	1.39%	1.58%	0.19%
Total	100.00%	100.00%	

# Colleagues by Age Group



Colleagues by Disability status

Disability			
Status	2019	2020	Variance
Disabled	5.47%	8.22%	2.75%
Non-			
Disabled	44.69%	68.60%	23.90%
Prefer not			
to	2.25%	7.17%	4.91%
say			
Not	47.59%	16.02%	-31.57%
Provided			
Total	100.00%	100.00%	



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

The Succession Process applies only to those at Director, and Head of Service (HOS) roles with identified successors from the HOS, Grade 8, and Grade 7 level population. The roles in which successors must be identified are business critical or fundamental to the ability of the organisation to successfully meet its goals.

The process is governed by our People policies:

- Equality, Diversity, and Inclusion
- Flexible Working
- Improving Performance
- Pay
- Redeployment Policy
- Secondment
- Recruitment and Selection

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

The SQA acknowledges that people who share/do not share certain Protected Characteristics may, on balance:

- May experience discrimination for example: younger people who may not have experience yet to be ready for succession consideration and or people who are younger and have a disability may find it more difficult to be considered.

It is important that SQA considers what actions to take to mitigate such situations and remove any disadvantage identified by this EQIA.

## **Evidence, Consultation and Engagement**

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

The policies which govern this practice have been developed in consultation with SQA's recognised Trades Unions, Unite and Unison, who represent all 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

## **Evidence of Stakeholder Engagement:**

Succession is governed by our staff policies to ensure fairness at work and equality for our colleagues. All our policies are signed off by our Trade Union Consultation Review Group (PRG):

Members of SQA Human Resources department and trade union representatives from *Unite the Union* and *Unison* meet weekly in SQA via the PRG. This group has been meeting weekly in SQA since July 2020. SQA's trade union representatives are also given statutory time off to attend relevant training, meetings and other information gathering activities as supported in our union framework agreement.

Evidence of all meeting minutes, actions and consultation undertaken with the PRG group (including Equality considerations in respect of all policies, activities, and functions) is detailed on a dedicated SQA shared resources site.

## **Staff Network Consultations:**

In June 2021, we formed a dedicated *Equality Impact Assessment Project Group* (EIAPG) with the aim of reviewing, assessing, and providing feedback from staff on all SQA HR policies from Equality perspectives.

[					
		Women's·			
Policy·Name¤	Review Date¤	Network¤	(ACE)¤	Disability·Network¤	
Redeployment¤	02/08/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Restructure¤	02/08/2021¤	Yes¤	¤	Yes¤	¤
Standby-&-Call-Out¤	23/06/2021¤	¤	Yes¤	Yes¤	Yes¤
Time∙Recording¤	09/08/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Attendance·Management¤	16/08/2021¤	Yes¤	Ħ	Yes¤	Yes¤
Childcare•Voucher¤	16/08/2021¤	Yes¤	Ħ	Yes¤	Yes¤
Dignity·at·Work¤	10/08/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Disciplinary¤	01/06/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Equalities, Diversity & Inclusion ×	23/08/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Fixed·Term·Workers¤	23/08/2021¤	Yes¤	Ħ	Yes¤	Yes¤
Grievance¤	29/06/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Improving Performance <sup>x</sup>	07/09/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Probation¤	06/09/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Recruitment-&-Selection¤	06/05/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Secondment¤	13/09/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Whistleblowing¤	22/07/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Flexible·Working¤	18/11/2021¤	Yes¤	Ħ	Yes¤	Yes¤
Flexitime¤	26/10/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Pay¤	09/12/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
TOIL¤	16/12/2021¤	Yes¤	Yes¤	Yes¤	Yes¤
Code·of·Conduct¤	24/02/2022¤	Yes¤	Yes¤	Yes¤	Yes¤
Conflict·of·Interest¤	10/03/2022¤	Yes¤	Yes¤	Yes¤	Yes¤
Pensions·Discretion¤	29/03/2022¤	Yes¤	Ħ	Yes¤	Yes¤
Redundancy¤	22/03/2022¤	Yes¤	Ħ	Yes¤	Yes¤
Relocation¤	31/03/2022¤	Yes¤	Ħ	Yes¤	Yes¤
Retirement¤	15/03/2022¤	Yes¤	Yes¤	Yes¤	Yes¤

The EIAPG group consists of representatives from each of the SQA staff networks listed on the previous page of this document.

**Evidence, feedback, and actions from all EIAPG staff network consultations** are recorded on a dedicated SQA *Microsoft Teams* page which was specifically created with the aim of listing potential equality risks that exist in HR policies / activities, sharing resources, recording feedback and scheduling future consultation meetings.









Religion or Belief										-
g		<b>Religion or B</b>	elief			2019	) 2	020	Variance	
		Christian				20.69	% 29	.82%	9.13%	
		Non-Christia	n			11.47	% 17	.28%	5.81%	1
		None				20.69	% 29	.29%	8.61%	1
		Prefer not to	say			3.759	% 10	.33%	6.58%	1
		Not Provided	4			43.41	% 13	.28%	-30.13%	1
		Total			100.00	0% 10	0.00%		1	
	An improved declaration rate	te was also s	hown foi	r this cha	aracteristic	: in 2020	). Chrisi	<i>tian</i> and	d No Relig	1
	of all responses.									
Sex			[		Canala					
				Female	Gende	r (Sex)	Male			
		Grade	2019	2020	Variance	2019	2020	Variar	nce	
		1	83.33%	66.67%	-16.67%	16.67%	33.33%			
		3	65.15%	65.00%	-0.15%	34.85%	35.00%		%	
		4	63.28%	64.71%	1.43%	36.72%	35.29%	-1.43	%	
		5	58.02%	61.54%	3.51%	41.98%	38.46%	-3.51	%	
		6	69.90%	69.90%		30.10%	30.10%			
		7	59.76%	57.89%	-1.86%	40.24%	42.11%	-		
		8	53.54%	56.34%	2.80%	46.46%	43.66%			
		HOS	39.39%	40.00%	0.61%	60.61%	60.00% 42.86%		%	
		EMT Total	57.14% 61.20%	42.86% 61.64%	0.44%	57.14% <b>38.80%</b>	42.86% 38.36%		%	
										_
	A greater number of SQA e								A 60% rep	)
	across most grades is evide	ent with a dec	liease to	o circa 4	0% IUI MO	re senio	i grade	5.		

Orientation	Sexual Orientation	2019	2020	Variance
	Bisexual	0.96%	1.26%	0.30%
	Gay man	1.39%	2.11%	0.71%
	Gay woman / Lesbian	0.96%	1.05%	0.09%
	Heterosexual/straight	46.20%	70.60%	24.41%
	In another way	0.11%	0.21%	0.10%
	Not sure	0.11%	0.11%	0.00%
	Prefer not to say	2.79%	8.01%	5.22%
	Not Provided	47.48%	16.65%	-30.83%
	Total	100.00%	100.00%	

oesn't currently report gender reassignment	data, as doing so may r	isk identifying indi	vidual respondents.		
uality profiling data is currently captured by S	SQA				
	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%			
	Pregnancy Status Not Pregnant Pregnant	Not Pregnant98.25%Pregnant1.75%	ColleaguesPregnancy Status20192020Not Pregnant98.25%98.95%Pregnant1.75%1.05%		

Care experience	Human Resources currently have no data for SQA that shows how many colleagues are Care Experienced.
(where relevant)	Nationally Who Cares? Scotland states:
	Education
	In 2019/20 64% of all school leavers had one or more qualification at SCQF level 6 or better, whereas only 14% of school leavers looked after within the last year had qualifications of that level. Care Experienced children are less likely to be in positive destinations nine months after leaving school. Figures from 2019-20 show that 75% of school leavers looked after within the last year were in positive destinations. This is compared to 92% of all schools leavers.
	At all levels, Care Experienced students have lower rates of completing courses compared to all students at university and college. Between Care Experienced students and non-Care Experienced students, there is a difference of 5.3% for retention at university, and the largest gap is in successful completion of full-time further education courses at college where the gap is 15.6% (SFC, 2019).
	Unemployment
	9 months after leaving school, 22% of school leavers looked after within the last year people were classed as unemployed, compared to 7% of their non-Care Experienced peers (Scottish Government, 2021).
	Criminalisation
	In a Scottish Prison Service survey carried out in 2019, 1/4 of the adult prison population indicated that during their up- bringing they had been in care (25%) (Scottish Prison Service, 2020). Around 40% of young people in custody report that they have been in care (Scottish Prison Service, 2021).
	Health
	In a study conducted in 2002, among young people aged 5–17 years who were looked after by local authorities in Scotland, 45% were assessed as having a mental health issue (Office for National Statistics, 2004).
	Homelessness
	Practitioners estimate that between 30-50% of individuals who are homeless could be Care Experienced.

# Impact and Opportunities for Action

Protected Characteristic	General Equality Duty
Age	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Whilst this process is open to all colleagues within SQA, there may be a risk to some age groups when considering successors, as younger people will not have necessarily had the breadth of experience needed to be a successor.
	Advance equality of opportunity
	Succession identification is based on ambition and capability to carry out the desired role. SQA should look to question senior leaders about the identified successors to ensure they have considered all employees and if younger individuals have ambition, they should consider a development path through MYReview to provide an opportunity for growth in the desired direction if capability matches.
	Foster good relations
	This practice does not specifically reference age and there is little evidence that this practice discriminates through age.

Protected Characteristic	General Equality Duty
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Risks of Discrimination in the SQA – Direct and Indirect:
	<b>Discrimination arising from disability</b> : It would be unlawful for the SQA to treat a disabled applicant less favourably due to something arising from their disability (source ACAS). Therefore, not considering an individual as a potential successor could risk direct discrimination.
	We are a disability confident organisation, and we are committed to ensuring any staff member who acquires a disability that we continue to enable them to stay in work.
	Advance equality of opportunity
	All staff have an equal opportunity to make their aspiration for progress in the organisation known to their leaders and are supported by the Improving Performance policy along with the MyReview process. Through the HR EQIAs it was identified that more learning can be provided to leaders around managing bias and improving the inclusive culture in their business areas,
	It is noted that only 8.2% of staff have identified as disabled and therefore there will be an even smaller number by law of averages being seen as successors or in business-critical roles.
	Foster good relations
	Reference to <i>Disability</i> is in SQAs Disability Confident Committed organisation status can help to recruit, retain, and develop disabled people who will help SQA to succeed.

Protected Characteristic	General Equality Duty
Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	According to 2011 Scotland census 96% of the population is white <u>https://www.scotlandscensus.gov.uk/census-</u> results/at-a-glance/ethnicity/
	Currently only 3% of SQA employees declared themselves as Minority Ethnicity against a national (Scotland) average of 5%.
	Advance equality of opportunity
	All internal staff have an equal opportunity to make their aspiration for progress in the organisation known to their leaders and are supported by the Improving Performance policy along with the MyReview process. Through the HR EQIAs it was identified that more learning can be provided to leaders around managing bias and improving the inclusive culture in their business areas,
	Foster good relations
	Further work has been identified by our HR EQIA actions that work will be undertaken to encourage staff to declare their protected characteristics including race to assist SQA to enhance the diversity of their workforce.

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
	We conclude there is no evidence to suggest that this process may impact directly on people of different <i>Religion or belief</i> and therefore make no further recommendations in this area.
	Neutral Equality related impact is therefore recorded in this area.
	Advance equality of opportunity
	All SQA employees are entitled to use, access and be subjected to Staff Policies and there is no evidence to indicate that this process could affect employees differently or less favourably, on the grounds of their <i>Religion/Belief</i> .
	Foster good relations
	There is no evidence to indicate that this process currently fosters good relations between employees of different Religion/Belief.

Protected Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The international longevity centre UK's paper on the intersection of age, gender, and promotion (sept 2021) found:
	<ul> <li>Younger women (below age 55) get hired into top positions such as Executive, Senior Manager and Manager at substantially higher rates than women aged 55+. Women under age 55 do seem to be 'favoured' therefore in terms of hiring into senior roles but the opposite seems true for men: Men aged 55+ are hired into those levels at higher rates than men under age 55. That is, older men appear to be 'favoured'.</li> </ul>
	<ul> <li>Another place where there is an age by gender intersectionality effect seems to be promotion from Support Staff to Professional Level where women below age 55 get promoted into the Professional Level at substantially higher rates than men below age 55, or than older men and women.</li> </ul>
	• Part of these rate differences could be a function of the comparatively low representation of women, particularly women below age 55, at higher levels.
	At SQA there is a 60% representation of females across most grades however this decreases to circa 40% for more senior grades.
	In the 2022 succession process 35 females were named and 26 males so would consider this as <b>positive impact</b> on the grounds of sex equality
	Advance equality of opportunity
	All staff have an equal opportunity to make their aspiration for progress in the organisation known to their leaders and are supported by the Improving Performance policy along with the MyReview process. Through the HR EQIAs it was identified that more learning can be provided to leaders around managing bias and improving the inclusive culture in their business area to support with progression and hiring.
	Foster good relations
	The process does not specifically reference sex/gender therefore there is no evidence to say that this process discriminates sex/gender

Protected Characteristic	General Equality Duty
Sexual Orientation	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	We conclude there is no evidence to suggest that this process may impact directly on people of different Sexual Orientations and therefore make no further recommendations in this area.
	Neutral Equality related impact is therefore recorded in this area.
	Advance equality of opportunity
	All SQA employees are entitled to use, access and be subjected to Staff Policies and there is no evidence to indicate that this process could affect employees differently or less favourably, on the grounds of their <i>Sexual Orientation</i> .
	Foster good relations
	There is no evidence to indicate that this process currently fosters good relations between employees of different sexual orientation.

Protected Characteristic	General Equality Duty
Gender Reassignment (Gender identity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
and transgender	It is possible that those undergoing gender reassignment may face prejudice that may manifest itself in unfair treatment from colleagues and managers. We conclude this is a marginal risk and there is no current evidence of this within SQA. There is therefore no evidence to suggest that this policy impacts directly / indirectly on people based on their <i>Gender Identity</i> .
	Neutral Equality related impact is therefore recorded in this area.
	Advance equality of opportunity
	Whilst, except for <i>gender reassignment</i> , there is currently no legal obligation placed on the SQA to provide equality of opportunity to people who identify as different Genders, it is a very relevant modern consideration – particularly in academic environments such as schools, colleges and universities. (Once again, highly relevant to the SQA.)
	Foster good relations
	There is no evidence to indicate that this policy currently fosters good relations between people of different <i>Gender Identities</i> or who are LGBTQ+.
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
	We conclude there is no evidence to suggest that this process may impact directly / indirectly on people who are <i>Married</i> or in a <i>Civil Partnership</i> and therefore make no further recommendations in this area.
	Neutral Equality related impact is therefore recorded in this area.
	Advance equality of opportunity

All SQA employees are entitled to use, access and be subjected to the Succession Process and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of their <i>Marital Status</i> .
Foster good relations
There is no evidence to indicate that this process currently fosters good relations between employees of different <i>Marital Status</i> .
No further recommendations are made in respect of this in relation to this policy.

Protected Characteristic	General Equality Duty
Pregnancy / Maternity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	Those who are pregnant or on maternity leave may feel that opportunities are excluded to them on succession. The process of succession is delivered to individuals through the MyReview process and therefore is governed by the Performance Policy. There is a small risk attached to pregnant women or those on maternity leave to be discriminated against during the time of their leave, however the succession process is carried out at periodic times throughout the year and therefore can be addressed and challenged throughout the year. Neutral Equality related impact is therefore recorded in this area.
	Advance equality of opportunity
	No actions identified
	Foster good relations
	There is no evidence to suggest that this process currently foster good relations, however SQA should continue to monitor equality data and act if needed. SQA as part of the HR Policy EQIAs are actioning learning for leaders on unbiased decisions and promoting equality. This will aid in addressing any potential discriminatory decisions for succession.

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
	Care experienced individuals may be more likely to have missed opportunities to gain qualifications in early life and this may also impact on their ability to perform in their employed role, and this may give the individual and the organisation cause for concern should they be faced with redeployment.
	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 and consider what support for growth and performance is needed to ensure equality of opportunity to leadership positions.
	Advance equality of opportunity All SQA employees are entitled to use, access and be subjected to the Succession Process and there is no evidence to indicate that this policy could affect employees differently or less favourably, on the grounds of Care Experience.
	Foster good relations
	There is no evidence to indicate that this process currently fosters good relations on the grounds of- Care Experience
	No recommendations are made in respect of this in relation to this process.