

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	By September 24	Additional Schedule Review Date	By September 23
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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
Review and assess monthly establishment management information packs containing fundamental employment data on SQA employees	People Analytics, Governance & Systems Manager	Commencing monthly from October 2022	
Review on a quarterly basis of employment law, case law and legislative changes, and equalities updates (including reviewing EHRC website).	HR Shared Services Manager	Commencing quarterly from January 2023	
Review and assess feedback on a quarterly basis from joint trade unions (Unite and Unison) through SQA's Joint engagement forum and Policy review group.	HR Shared Services Manager	Commencing quarterly from January 2023	
Review and assess feedback on a quarterly basis from each of SQA's staff community network groups	HR Shared Services Manager	Commencing quarterly from January 2023	

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Continue to review and assess on an annual basis SQA's engagement People survey	OD Manager	Commencing annually from October 2023	
Review and assess on an annual basis all SQA employee lifecycle data	People Analytics, Governance & Systems Manager	Commencing annually from January 2024	
Continue to review and assess every 2 years SQA's equality mainstreaming report [next report due May 2023]	People Reward and Equalities Manager	Commencing every 2 years from May 2023	
Continue to review and assess every 2 years SQA's workforce equality monitoring report [next report due May 2023]	People Reward and Equalities Manager	Commencing every 2 years from May 2023	

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Identified Actions	General Equality Duty	Owner	Date	Comment & Review
<p>Age, Disability, Race, Religion/belief, Sex Add some wording to the policy to explain what part time employees can do to complete their timesheet if they are not at work at the end or beginning of a working week.</p>	<p>Advance equality of opportunity Foster good relations</p>	<p>Head of HR</p>	<p>September 23</p>	
<p>Disability Some wording to encourage line managers to handle any anxieties/concerns sensitively and with appropriate support is advisable.</p>	<p>Advance equality of opportunity</p>	<p>Head of HR</p>	<p>September 23</p>	
<p>Gender re-assignment SQA to add Gender identity i.e. all people who identify as more than one gender or none) to all future Equality monitoring reporting.</p>	<p>Advance equality of opportunity</p>	<p>People Analytics, Governance & Systems Manager</p>	<p>September 24</p>	

Policy Aims:

Name of Policy or practice	Time Recording
New Policy or Revision	New
Name of Policy Owner	Director of People
Date Policy Owner Confirmed Completion	01/04/19

What is the rationale for this policy or practice?

The purpose of this policy is to define the framework for time recording at SQA which is used for cost allocation and workforce planning.

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

Time recording allows SQA to support cost allocation and workforce planning. Cost allocation is standard good business practice allowing SQA to greater understand the cost of delivering our products and services in the markets in which it operates.

Workforce planning is a process through which we ensure we have the right people with the right skills in the right numbers in the right places and at the right time.

A recent Chartered Institute of Personnel and Development (CIPD) factsheet for employers [Workforce Planning | Factsheets | CIPD](#) stated: 'Workforce planning is an integral part of people management and provides the context for most other activities concerned with acquiring, developing and deploying people'.

What are the aims of this policy or practice?

This policy sets out SQA's approach to time recording to ensure SQA have information to support the delivery of cost allocation and workforce planning. To achieve this, there is a requirement for all directly employed SQA employees (excluding individuals who do not have access to SQA systems), non-diet agency staff and contractors to record all time worked. Everyone belonging to this group must comply with this requirement. The policy itself, shows overall aims, detail and responsibilities and has a flowchart for easy reference.

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

This policy sets out a procedure for time recording in a fair, accurate and consistent manner which will be applied throughout the organisation and to ensure this quality assurance will be undertaken.

This policy applies to all directly employed SQA employees (excluding individuals who do not have access to SQA systems), non-diet agency staff and contractors.

The main considerations were;

Age - when completing this assessment, we did consider whether the technicalities of recording time explained in the policy may be harder for older workers to use/access but have not found any evidence in SQA to support this. It is noted however that there is a guide referenced in the policy for completing the timesheets and contact details if help is needed.

We considered the fact that access to Time Recording is only for SQA employees with access to our I.T. systems. Some groups of employees e.g. Cleaners and Facilities employees - most of whom are over aged 50+ do not actually complete time sheets. (65 % of this cohort without access do not currently record time sheets themselves.)

Disability - there is no evidence to suggest employees experience accessibility issues particularly linked to disability in SQA. We have successfully engaged with Access to Work: get support if you have a disability or health condition: What Access to Work is - GOV.UK (www.gov.uk). previously and would use this service if there were issues that couldn't be resolved internally.

As part of this EqlA, we explored neurodiversity and how this may impact on the rules relating to how to record time and whether these could be too stringent / prescriptive or (conversely) too flexible - causing anxiety and unintentional stress.

The policy clearly states that recording of hours is based on trust, so line managers are not able/asked to check hours unless it's a claim for overtime. This is likely to help employees who experience anxiety. There remains a consideration around providing support for employees who may find the system too flexible and open.

Race - from national statistics, we know that a total of 25% of all employees work part time. This figure increases slightly to 31 % for employees who identify as either Pakistani or Bangladeshi.

This is of material relevance to this EqlA as Indian and Pakistani employees are the most prevalent minority ethnicity groups in SQA.

We identified that there is a slight risk that this cohort of employees may be adversely impacted by complying with the requirement to complete a timesheet by Monday at noon (with disciplinary implications if someone persistently fails to do so) .

This could impact more on employees who do not work on a Friday as their time to complete the timesheet is reduced.

Whilst a timesheet can be completed earlier than a Friday for that working week, this isn't currently referenced in the policy.

Additional wording is therefore recommended to explain to part time employees what to do if they are not at work at the end or beginning of a working week.

Religion/belief - when undertaking this EqlA, we explored how / why completing time sheets on a Friday might not be practical on the grounds of an employee's Religion or Belief.

For example, within Islam, Friday corresponds to the equivalent of Sunday in Christianity and Saturday in Judaism. All being regarded as 'holy days' - considered by many as a day of religious observance and rest.

To mitigate this risk, explicit references that (i) Friday working may not be possible for some religions and (ii) Due consideration is given to flexibility around working time/hours should be added to the existing policy. Also, the stated requirement in the policy to complete a timesheet by Monday at noon may also adversely impact on any employees who do not work on a Friday as their time to complete the timesheet is reduced.

As previously stated, timesheets can actually be completed earlier than Friday within SQA. This isn't however clearly referenced in the policy. Additional wording should be added to explain how to record timesheets for any employees who are not at work at either the beginning or the end of a working week for reasons of religious observance.

Sex - we identified that female employees are, on balance, more likely to work part time than men. Therefore, as per our comments for *Religion and Belief*, some part time workers, may be adversely impacted by this policy as their time to complete the timesheet is reduced. Adding explicit further guidance to this policy would mitigate this risk.

Also we identified that certain job roles in SQA are almost exclusively occupied by employees of one Sex. For example, cleaning staff are mostly female. Note this cohort do not currently record time sheets themselves as they do not have direct access to internal SQA IT systems. (We also recognise that there are both male and female cleaners at SQA).

This risk is however currently mitigated as the policy does state that SQA managers will complete time sheets for SQA employees who do not have computer access.

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 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.
- MAC (Make A Change Group).
- Mental Health First Aiders Forum.
- SQA Rainbow Network.
- Women's Network.
- Parent & Carers Network.

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

Evidence of Stakeholder Engagement:

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.

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 H.R. policies / activities, sharing resources, recording feedback and scheduling future consultation meetings.

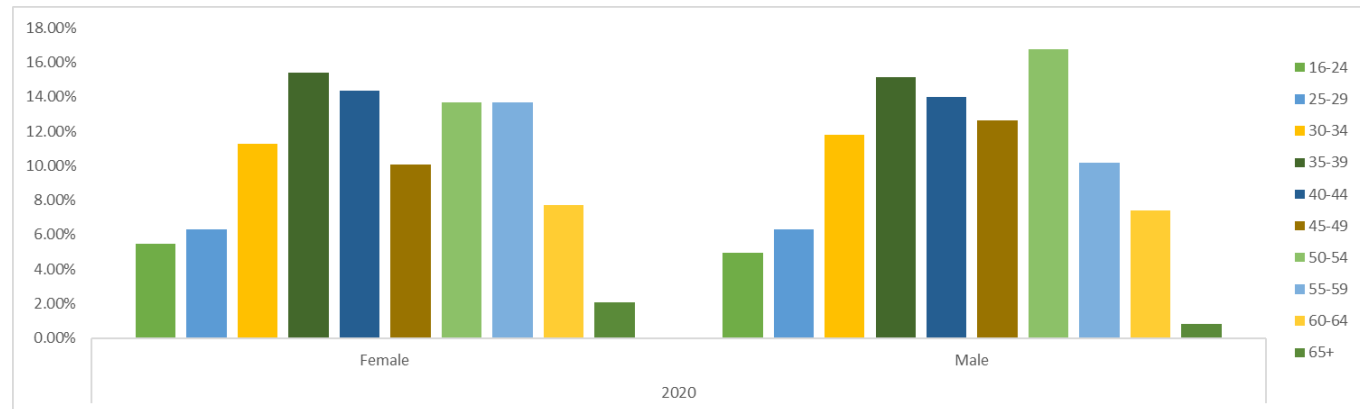
What stakeholders have you engaged with in the development of this policy or practice?

Evidence of Staff Network Consultation Meetings:

Policy-Name	Review-Date	Women's- Network	(ACE)	Disability-Network	Rainbow-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		Yes	Yes
Childcare-Voucher	16/08/2021	Yes		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		Yes	Yes
Grievance	29/06/2021	Yes	Yes	Yes	Yes
Improving-Performance	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		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		Yes	Yes
Redundancy	22/03/2022	Yes		Yes	Yes
Relocation	31/03/2022	Yes		Yes	Yes
Retirement	15/03/2022	Yes	Yes	Yes	Yes

What evidence about equality groups do you have to support this assessment?

Age



Approximately 36% of the employee group in SQA are aged 50 and over, there is an even split of females and males in this age band. This information is available at [Colleagues by age band and gender \(sex\) 2020 \(as in Table 1.05\) workforce-equality-monitoring-report-2019-2021.pdf \(sqa.org.uk\)](https://www.sqa.org.uk/workforce-equality-monitoring-report-2019-2021.pdf)

Source: SQA Workforce equality monitoring report 2019-21

SQA has also collected data on employees with caring responsibilities and this shows that 23.60% of employees identify as a carer. This information helps us to consider the different needs of individuals from a carers perspective. We also know from our quarterly reporting dashboard that 27.1% of our workforce overall have a flexible working pattern, though we do not record what patterns people work in. This number is, however likely to include a reasonable number of compressed working patterns meaning not everyone is at work Monday to Friday.

Percent

Age Group	Unpaid Carer Population
16-30	9.4
31-49	24.5
50-64	38.3
65+	27.8
Total	100

Source: Labour Force Survey

This evidence helps us balance the internal data on carer's referenced above. A higher % of carer's who may be at work are in the 50+ age category.

Disability	Table 1.07 Colleagues by disability status SQA				
	Disability Status	2019	2020	Variance	
	Disabled	5.47%	8.22%	2.75%	
	Non-Disabled	44.69%	68.60%	23.90%	
	Prefer not to Say	2.25%	7.17%	4.91%	
	Not Provided	47.59%	16.02%	-31.57%	
	Total	100.00%	100.00%		
	Year	Disabled people	Disabled people	Non-disabled people	Non-disabled people
		Full time (%)	Part time (%)	Full time (%)	Part time (%)
	2013/14	65.6	34.4	75.4	24.6
2014/15	65.4	34.6	75.7	24.3	
2015/16	64.6	35.4	75.9	24.1	
2016/17	64.8	35.2	76.2	23.8	
2017/18	65.4	34.6	76.2	23.8	
2018/19	65.9	34.1	76.9	23.1	
2019/20	65.3	34.7	77.1	22.9	
2020/21	68.0	32.0	78.7	21.3	
Unweighted sample					
2020/21	8,749	4,404	57,587	17,514	
				Source: ONS	

There is no evidence to suggest employees experience accessibility issues particularly linked to disability in SQA. We have successfully engaged with [Access to Work: get support if you have a disability or health condition: What Access to Work is - GOV.UK \(www.gov.uk\)](https://www.gov.uk). previously and would use this service if there were issues that couldn't be resolved internally.

As part of this EqIA, we explored neurodiversity and how this may impact on the rules relating to how to record time and whether these could be too stringent / prescriptive or (conversely) too flexible - causing anxiety and unintentional stress.

The policy clearly states that recording of hours is based on trust, so line managers are not able/asked to check hours unless it's a claim for overtime. This is likely to help employees who experience anxiety. There remains a consideration around providing support for employees who may find the system too flexible and open.

Neurodiversity at work | Acas report encourages disclosure to those working around you to help understanding and specific support/adjustments. Some wording to encourage line managers to handle any anxieties/concerns sensitively and with appropriate support would therefore be advisable, for example an individual who is anxious about their time being recorded inaccurately could ask their line manager to check before submitting their weekly hours.

SQA don't specifically record neurodiversity data, but we know from sources like Neurodiversity | Health Assured that an estimated 1 in 7 of UK population have some neurodiversity traits. A check on this policies impact with our respective Community Network groups would be useful to explore whether there have been or are any issues.

We know from national statistics that employees with a disability are more likely to work part time or at least working some form of flexible hours (32% of disabled employees). A stated requirement to complete a timesheet by a Monday with disciplinary implications if someone persistently fails to do so is likely to impact more on part time workers who may not work on a Monday or the previous Friday to ensure they can complete their timesheet on time. The timesheet can be completed earlier than a Friday for that working week however this isn't referenced in the policy so some wording could be added to explain to part time employees what to do if they are not at work at the end or beginning of a working week.

Race

Table 1.12 Colleagues by Race

Race	2019	2020	Variance
Ethnic Minority	1.82%	3.16%	1.34%
White	56.06%	80.40%	24.34%
Prefer Not to Say	1.07%	3.48%	2.41%
Not Provided	41.05%	12.96%	-28.09%
Total	100.00%	100.00%	

Currently only 3% of SQA employees declared themselves as Minority Ethnicity against a national (Scotland) average of 5%.

Table 1.15 Race: Colleagues by black and minority ethnicities

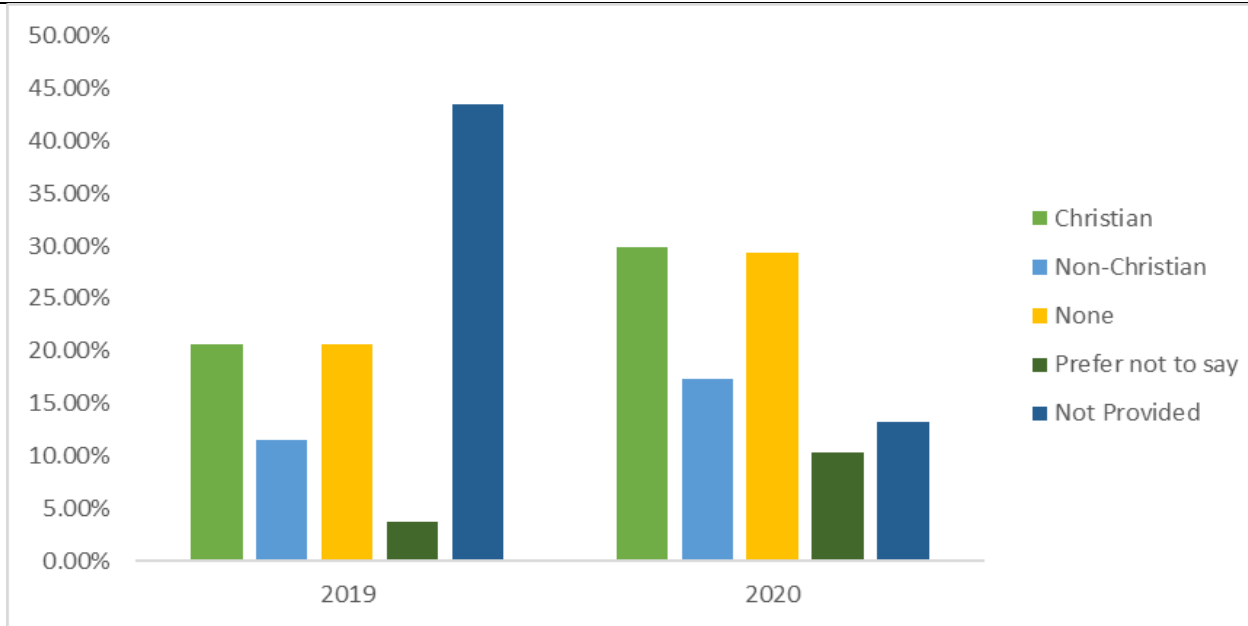
Black and Minority Ethnicities	2019	2020	Variance
African, African Scottish or African British	5.88%	6.67%	0.78%
Any Mixed or Multi ethnic groups	11.76%	10.00%	-1.76%
Any Other Asian Ethnic Group	5.88%	6.67%	0.78%
Any Other Caribbean or Black Ethnic Group		3.33%	3.33%
Any Other Ethnic Group		6.66%	6.66 %
Black, Black Scottish or Black British	5.88%	6.67%	0.78%
Chinese, Chinese Scottish or Chinese British	11.76%	6.67%	-5.10%
Indian, Indian Scottish or Indian British	17.65%	16.67%	-0.98%
Pakistani, Pakistani Scottish or Pakistani British	41.18%	36.67%	-4.51%
Total	100.00%	100.00%	

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Race	Ethnicity	Full time %	Part time %
	All	75	25
	Asian	75	25
	Indian	81	19
	Pakistani and Bangladeshi	69	31
	Asian other inc Chinese	73	27
	Black	72	27
	Mixed	74	26
	White	75	25
	White British	75	25
	White other	82	18
	Other	73	26

Source [Full time and part time employment - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://ethnicity-facts-figures.service.gov.uk)

Religion or Belief



Source: SQA workforce equality monitoring report 2019-21

29.82 colleagues say they are Christian, 17.28% are non-Christian, 29.29% declared no religion, 10.33% preferred not to say, 13.28% did not provide any information. This data is available at [Colleagues by religion or belief \(as in table 1.16\) workforce-equality-monitoring-report-2019-2021.pdf \(sqa.org.uk\)](#)

Sex

Grade	Gender (Sex)					
	Female			Male		
	2019	2020	Variance	2019	2020	Variance
1	83.33%	66.67%	-16.67%	16.67%	33.33%	16.67%
3	65.15%	65.00%	-0.15%	34.85%	35.00%	0.15%
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%	1.86%
8	53.54%	56.34%	2.80%	46.46%	43.66%	-2.80%
HOS	39.39%	40.00%	0.61%	60.61%	60.00%	-0.61%
EMT	57.14%	42.86%		57.14%	42.86%	
Total	61.20%	61.64%	0.44%	38.80%	38.36%	-0.44%

Source: SQA workforce equality monitoring report 2019-21

A greater number of SQA employees overall are female - 62% female versus 38% male. A 60% representation of females across most grades is evident with a decrease to circa 40% for more senior grades. This data is available from Table 1.05: Colleagues by age band and gender (sex) [workforce-equality-monitoring-report-2019-2021.pdf \(sqa.org.uk\)](#)

The population of Scotland in the 2011 Census was split 51.5% female and 48.5% male.

Sexual 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%	
<p>Source: SQA workforce equality monitoring report 2019-21</p> <p>70.60% colleagues say they are heterosexual, 1.26% bisexual, 2.11% gay man, 1.05% gay woman, 0.21% in another way, 0.11% not sure, 8.01% prefer not to say and 16.65% did not provide information. This data is available at Table 1.18 Colleagues by Sexual Orientation workforce-equality-monitoring-report-2019-2021.pdf (sqa.org.uk)</p>				
Gender Re-assignment (Gender identity and transgender)	<p>No equality profiling data is currently captured by SQA. One of the recommendations from this Equality impact assessment is for SQA to add Gender identity i.e. all people who identify as more than one gender or none) to all future Equality monitoring reporting.</p>			
Marriage/Civil Partnership	<p>No equality data is currently captured by SQA</p>			

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%	
	<p>Source: SQA workforce equality monitoring report 2019-21</p> <p>98.95% of colleagues are not pregnant, 1.05% are pregnant available at Table 1.20: Colleagues by pregnancy status workforce-equality-monitoring-report-2019-2021.pdf (sqa.org.uk)</p>			
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	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p> <p>The Time Recording policy makes it clear that time sheets must be completed by 12 noon on a Monday for the previous working week. It states:</p> <p><i>‘We will send you a reminder on a Friday afternoon to submit your timesheet. If you do not do this by Monday at 12.00 noon, we will issue a further reminder to you on the Tuesday morning. If you still fail to submit your timesheet by the end of the day, we will escalate it to your line manager on Wednesday morning asking them to talk to you and ensure you submit it by close of business on the Wednesday.’</i> The policy goes on to say:</p> <p><i>‘If you however fail to complete a timesheet by the required deadlines, HR will report on and escalate it to your line manager to investigate and ask them to discuss this with you and ensure compliance with this requirement. Persistent non-compliance with timesheet completion and submission may be treated as misconduct and will lead to a disciplinary action in accordance with our Disciplinary Policy.’</i></p> <p>We know from national statistics that older workers are more likely to have external responsibilities – for example caring and this means a proportion of the 36% of SQA employees who are aged 50+, are more likely to be part time or at least working some form of flexible hours. A stated requirement to complete a timesheet by a Monday with disciplinary implications if someone persistently fails to do so is likely to impact more on part time workers who may not work on a Monday or the previous Friday to ensure they can complete their timesheet on time. (The timesheet can actually be completed earlier than a Friday for that working week however this isn’t referenced in the policy so some wording could be added to explain to part time employees what to do if they are not at work at the end or beginning of a working week.)</p>

	<p>Risks of Age Discrimination:</p> <p>When completing this assessment, we did consider whether the technicalities of recording time explained in the policy may be harder for older workers to use/access but have not found any evidence in SQA to support this. It is noted however that there is a guide referenced in the policy for completing the timesheets and contact details if help is needed.</p> <p>We considered the fact that access to Time Recording is only for SQA employees with access to our I.T. systems. Some groups of employees e.g. Cleaners and Facilities employees - most of whom are over aged 50+ do not actually complete time sheets. (65 % of this cohort without IT access do not currently record time sheets themselves.)</p> <p>This risk is however currently mitigated as the policy does state that SQA managers will complete time sheets for SQA employees who do not have computer access.</p> <p>A neutral impact has ultimately been recorded for this characteristic.</p>
	<p><u>Add some wording to the policy to explain what part time employees can do to complete their timesheet if they are not at work at the end or beginning of a working week as this is currently not clear.</u></p>
	<p>Advance equality of opportunity</p>
	<p>Currently we do not consider that there are opportunities to advance equality beyond what has been considered in the previous section. Where opportunities arise in response to the monitoring of this policy and continual feedback from staff this will be taken forward.</p>
	<p>Foster good relations</p>
<p>No evidence to show that the <i>Time Recording</i> policy has any impact on employees of different Age groups.</p>	

Protected Characteristic	General Equality Duty
<p>Disability</p>	<p>The process of Time Recording in SQA requires access to <i>Business World</i> (BW) - a system that is usable in different devices and is compatible with access requirements for audio and larger script. BW is a web based system and the accessibility functionality from popular browsers such as <i>Chrome</i> allows for accessibility considerations e.g. font size, contrast, read aloud etc.</p> <p>There are also user guides and a dedicated team available for support with access/user issues. Responsibility to provide guidance lies with individual SQA line managers.</p> <p>Risks of Disability Discrimination:</p> <p>There is no evidence to suggest employees experience accessibility issues particularly linked to disability in SQA. We have successfully engaged with <u>Access to Work: get support if you have a disability or health condition: What Access to Work is - GOV.UK (www.gov.uk)</u>. previously and would use this service if there were issues that couldn't be resolved internally.</p> <p>As part of this EqIA, we explored neurodiversity and how this may impact on the rules relating to how to record time and whether these could be considered to be too stringent / prescriptive or (conversely) too flexible - causing anxiety and unintentional stress.</p> <p>The policy clearly states that recording of hours is based on trust so line managers are not able/asked to check hours unless it's a claim for overtime. This is likely to help employees who experience anxiety. There remains a consideration around providing support for employees who may find the system too flexible and open.</p> <p><u>Neurodiversity at work Acas</u> report encourages disclosure to those working around you to help understanding and specific support/adjustments. Some wording to encourage line managers to handle any anxieties/concerns sensitively and with appropriate support would therefore be advisable, for example an individual who is anxious about their time being recorded inaccurately could ask their line manager to check before submitting their weekly hours.</p> <p>SQA don't specifically record neurodiversity data but we know from sources like <u>Neurodiversity Health Assured</u> that an estimated 1 in 7 of UK population have some neurodiversity traits. A check on this policies impact with our respective Community Network groups would be useful to explore whether there have been or are any issues.</p>

Disability	<p>We know from national statistics that employees with a disability are more likely to work part time or at least working some form of flexible hours (32% of disabled employees). A stated requirement to complete a timesheet by a Monday with disciplinary implications if someone persistently fails to do so is likely to impact more on part time workers who may not work on a Monday or the previous Friday to ensure they can complete their timesheet on time. The timesheet can be completed earlier than a Friday for that working week however this isn't referenced in the policy so some wording could be added to explain to part time employees what to do if they are not at work at the end or beginning of a working week.</p> <p>Risks of Disability Discrimination:</p> <p>On balance, the policy applies to all employees with access to systems and is well supported with guides. Technology and personal contact available.</p> <p>A neutral impact has been recorded for this characteristic.</p>
	<p><u>Advisory Comments:</u></p> <p><u>Additional wording to be added to the policy to explain to part time employees what to do if they are not at work at the end or beginning of a working week.</u></p> <p><u>Additional wording to encourage line managers to handle any anxieties/concerns relating to recording time experienced by employees who have a disability should be dealt with sensitively providing signposts to support where required.</u></p>
	Advance equality of opportunity
	<p>There is no evidence to show this policy advances Equality of opportunity for employees who have a Disability.</p>
	Foster good relations
	<p>It may be useful to check in with relevant Community Network groups to review the policy specifically around access issues and/or any concerns/anxiety around completion of weekly timesheets.</p>
	<p><u>Any access issues should also be checked with appropriate Community Network group .</u></p>

Protected Characteristic	General Equality Duty
Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>Risks of Discrimination:</p> <p>From national statistics, we know that a total of 25% of all employees work part time. This figure increases slightly to 31 % for employees who identify as either Pakistani or Bangladeshi.</p> <p>This is of material relevance to this EqIA as Indian and Pakistani employees are the most prevalent minority ethnicity groups in SQA.</p> <p>We identified that there is a slight risk that this cohort of employees may be adversely impacted by complying with the requirement to complete a timesheet by Monday at noon (with disciplinary implications if someone persistently fails to do so) This could impact more on employees who do not work on a Friday as their time to complete the timesheet is reduced.</p> <p>Whist a timesheet <u>can</u> be completed earlier than a Friday for that working week, this isn't currently referenced in the policy.</p> <p>Additional wording is therefore recommended to explain to part time employees what to do if they are not at work at the end or beginning of a working week.</p>
	<p>A minor Equality impact is identified which could easily be mitigated.</p> <p><u>Additional wording could be added to explain to part time employees what to do if they are not at work at the end or beginning of a working week.</u></p>
	Advance equality of opportunity
	There is no evidence to show this policy advances equality of opportunity for employees of different ethnicities or nationalities. Whist the system is only available in English. On balance, employees who are required to complete timesheets in SQA will be required to both speak and write to a good standard of English.
	Foster good relations
	There is no evidence to show this policy promotes or fosters good relations between employees of different ethnicities or nationalities.

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
	<p>We know 17% of SQA employees identified with either a religion or belief in 2020. religion-belief-discrimination-guide.pdf (acas.org.uk)</p> <p>Risks of Discrimination:</p> <p>When undertaking this EqIA, we explored how / why completing time sheets on a Friday might not be practical on the grounds of an employee’s <i>Religion or Belief</i>.</p> <p>For example, within Islam, Friday corresponds to the equivalent of Sunday in Christianity and Saturday in Judaism. All being regarded as ‘holy days’ - considered by many as a day of religious observance and rest.</p> <p>To mitigate this risk, explicit references that (i) Friday working may not be possible for some religions and (ii) Due consideration is given to flexibility around working time/hours should be added to the existing policy. Also, the stated requirement in the policy to complete a timesheet by Monday at noon may also adversely impact on any employees who do not work on a Friday as their time to complete the timesheet is reduced.</p> <p>As previously stated, timesheets can actually be completed earlier than Friday within SQA. This isn’t however clearly referenced in the policy. Additional wording should be added to explain how to record timesheets for any employees who are not at work at either the beginning or the end of a working week for reasons of religious observance.</p> <p>A minor Equality impact is identified which could easily be mitigated.</p> <p><u>Additional wording should be added to the policy to explain to part time employees what to do if they are not at work at the beginning or end of a working week.</u></p>
	Advance equality of opportunity
	There is no evidence to show this policy advances equality of opportunity for employees of different <i>Religions or Beliefs</i> .
	Foster good relations
	There is no evidence to show this policy fosters good relations between employees of different <i>Religion/Beliefs</i> .

Protected Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>SQA staff compliment is shown below. The female to male mix is 62% to 38%.</p> <p>Risks of Sex Discrimination:</p> <p>We identified that female employees are, on balance, more likely to work part time than men. Therefore, as per our comments for <i>Religion and Belief</i>, some part time workers, may be adversely impacted by this policy as their time to complete the timesheet is reduced. Adding explicit further guidance to this policy would mitigate this risk.</p> <p>Also we identified that certain job roles in SQA are almost exclusively occupied by employees of one Sex. For example, cleaning staff are mostly female. Note this cohort do not currently record time sheets themselves as they do not have direct access to internal SQA IT systems. (We also recognise that there are both male and female cleaners at SQA).</p> <p>This risk is however currently mitigated as the policy does state that SQA managers will complete time sheets for SQA employees who do not have computer access.</p> <p>In summary, two minor Equality impacts are identified. The first could easily be mitigated via policy amendments (see below), the second is currently mitigated in SQA by managers completing sheets for employees who do not have computer access.</p> <p><u>As previously stated, additional wording should be added to the policy explain to part time employees what to do if they are not at work at the beginning or end of a working week.</u></p>
	Advance equality of opportunity
	There is no evidence indicating how this policy advances equality of opportunity for employees of different Sexes.
	Foster good relations
	There is no evidence indicating how this policy fosters good relations between employees of different Sexes.

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>We know an individuals sexual orientation can lead to an increased likelihood of mental health conditions referenced widely in articles like this About LGBTIQ+ mental health - Mind.</p> <p>There may be a subsequent need to attend appointments such as counselling etc and we considered the possibility of increased anxiety and possible disadvantage if the reason for absence and subsequent patterns were recorded. The policy guidance makes it clear that any planned absence would only be put through as one absence code. Therefore, we can see no disadvantage and have concluded neutral impact.</p> <p>A neutral impact has been recorded for this characteristic.</p>
	Advance equality of opportunity
	There is no evidence indicating how this policy advances equality of opportunity for employees of different <i>Sexual Orientations</i> .
	Foster good relations
	There is no evidence indicating how this policy fosters good relations between employees of different <i>Sexual Orientations</i> .

Protected Characteristic	General Equality Duty
<p>Gender Re-assignment (Gender identity and transgender)</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>As part of this EqIA, we considered whether taking time off for appointments relating to reassignment such as counselling etc may need to be recorded. If a pattern emerged would this be disadvantageous. As per the previous section, the policy guidance makes it clear that any planned absence would only be put through as one absence code.</p>
	<p>A neutral impact has therefore been recorded for this characteristic.</p>
	<p>Advance equality of opportunity</p>
	<p>Transgender data is not disclosed or shared within this analysis due to the limited sample size and to ensure compliance with GDPR legislation to protect individuals' personal information.</p>
	<p>Foster good relations</p>
	<p>Given the lack of data we would recommend consideration to reviewing our reporting on gender identity. This may help us understand and act on any gaps/issues arising.</p>
	<p><u>One of the recommendations from this Equality impact assessment is for SQA to add Gender identity i.e. all people who identify as more than one gender or none) to all future Equality monitoring reporting.</u></p>

Protected Characteristic	General Equality Duty
<p>Marriage/Civil Partnership</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</p>
	<p>We can see no impact in this area.</p> <p>A neutral impact has been recorded for this characteristic</p>
	<p>Advance equality of opportunity</p>
	<p>There is no evidence to show this policy impacts on <i>Marriage/Civil partnership</i>.</p>
	<p>Foster good relations</p>
	<p>There is no evidence to show this policy impacts on <i>Marriage/Civil partnership</i>.</p>

Protected Characteristic	General Equality Duty
Pregnancy / Maternity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	<p>We considered whether a need to attend pregnancy related appointments may be a disadvantage if the reason for absence and subsequent patterns were recorded. The policy guidance makes it clear that any planned absence would only be put through as one absence code. Therefore, we can see no disadvantage and conclude neutral impact.</p> <p>A neutral impact has been recorded for this characteristic.</p>
	Advance equality of opportunity
	There is no evidence to show this policy impacts on employees on the grounds of <i>Pregnancy/Maternity</i> .
	Foster good relations
	There is no evidence to show this policy impacts on employees on the grounds of <i>Pregnancy/Maternity</i> .

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
	<p>Whilst there is currently no evidence to suggest that care experience colleagues are placed at a disadvantage compared to other colleagues (or vice versa), <u>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.</u></p>
	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.

N/A