

**EQUALITIES AND HUMAN RIGHTS COMMITTEE
RACE EQUALITY, EMPLOYMENT AND SKILLS INQUIRY
SUBMISSION FROM SCOTTISH QUALIFICATIONS ASSOCIATION**

Inquiry into Race Equality, Employment and Skills

Thank you for your letter on behalf of the Equalities and Human Rights Committee, seeking information about SQA's approach to increasing employment of minority ethnic people. We appreciate the date for response was extended until 30 June 2020.

The Committee specifically requested information on:

1. the actions taken to increase employment of minority ethnic people
2. the data you have collected and used (PSED or otherwise) to inform these actions
3. any best practice examples you'd wish to highlight to other public authorities
4. how you are monitoring progress, and
5. what further action you've identified to reach your objective.
6. Please find below our response to your request:

Action taken to increase employment of minority ethnic people

SQA's job adverts state that we are an equal opportunities employer and the following statement appears on our website and others we advertise on: -

SQA welcomes applications from every section of the community. We are an Equal Opportunities employer and encourage applications from all members of the community

The main recruitment sites used are S1 jobs, Indeed and LinkedIn to try to reach as wide a population as possible.

The 2020-21 HR operational plan includes an overarching goal to foster an increasingly diverse workforce that fully embraces equality and diversity across the organisation. One of the actions related to this goal includes the development of a positive action plan to improve equality and diversity in the workplace. SQA is a member of Business in the Community Scotland (BICS) and we are currently investigating the opportunity to sign up to the Race at Work Charter which would be one aspect of a positive action plan.

This charter has five calls to action for employers to ensure ethnic minority employees are represented at all levels. The first call to action is to appoint an Executive sponsor for race to provide visible leadership on race and ethnicity in the organisation and drive key actions such as setting targets for ethnic minority representation, briefing recruitment agencies and supporting mentoring and sponsorship.

We are currently reviewing all our HR policies. This includes the equal opportunities in employment policy (renamed equality policy as part of the policy review), the Anti-bullying and harassment policy (renamed Dignity at Work policy) and recruitment and selection policy. The draft equality policy includes the following commitments: -

“We are committed to promoting equality and diversity among our workforce. We support a culture that actively values difference recognising that people from different backgrounds and experiences can bring valuable insights and enhance the way we work.

We aim to be an inclusive organisation, committed to providing equal opportunities throughout employment including in the recruitment, training and development of colleagues, and to pro- actively tackle and eliminate discrimination.

This policy sets out our approach to equality and diversity. We believe there should be no unlawful discrimination against any member of staff or job applicant with recognised protected characteristics: age, disability, ethnicity (including race, colour, nationality and caste), gender, gender reassignment, marriage or civil partnership, pregnancy or maternity, religion or belief, sex or sexual orientation.

We oppose all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.”

The revised equality and recruitment and selection policies are in draft form and are subject to consultation with trade unions which commences from 1 July 2020.

Data collected and used (PSED or otherwise) to inform these actions

SQA’s Equality Mainstreaming Report 2017-19 details an annual breakdown of employment monitoring data under the duty to gather and use employee information. The report details the progress made during 2017-19 to gather this information. The data published in 2019 includes applicant information only. Further work is required to enable employment data monitoring throughout the full recruitment cycle.

The quantity of the recruitment data we hold has improved with the implementation of our new e- recruitment system. We request that all candidates complete an equal opportunities monitoring form as part of the application process. It is made clear that this information is kept confidential to HR and is not seen by anyone else.

In April 2017, SQA updated its equal pay statement containing information on occupational segregation and equal pay policy, to include — for the first time — disability and race. SQA’s Equal pay audit and update is included in section 3 of our Equality Mainstreaming Report.

SQA implemented a new Finance/HR system in April 2019. The decision was taken not to migrate equality and diversity data to the new system as a result of differing equality and diversity classifications between the two systems. Following implementation, employees were asked to complete equality and diversity data, however, the level of data completion remains low and we acknowledge that data gaps make it difficult to determine an accurate representation of staff composition, development or retention by protected characteristic. As a result, we are currently developing an equality campaign through our HR equality sub-group which includes trade union representatives and employee network groups. It is planned to run the first of a series of campaigns starting this summer over the next few months to encourage colleagues to complete equality and diversity data. The information to be used in the campaign will build on information used in previous campaigns.

It is also planned to further improve the level of data on our e-recruitment system to enable employment data monitoring throughout the full recruitment cycle.

Best practice examples

We currently have three well established colleague networks in operation across the organisation – Rainbow Network, Disability Network and Women’s Network. We are currently exploring opportunities for a carer’s network and a BAME network. Through the network groups we aim to position SQA as an inclusive employer of choice that welcomes, embraces and celebrates the contribution of a diverse workforce.

We run a Values Led Leadership programme and as part of this, we put an emphasis on authenticity, psychological safety and how comfortable people are in bringing their whole selves to work. The leaders are encouraged to consider how they can create an inclusive environment for their teams where everyone can feel comfortable in being who they are, and where everyone’s talent is appreciated and recognised.

We have mandatory diversity and inclusion modules which form part of our Line Manager training programme. This module is then explored further in our Line Manager only workshops where we agree practical activities to encourage creating a diverse team and ensuring all voices are heard and all talent is included. We also include diversity and inclusion as a key theme in our Line Manager clinics.

Monitoring progress

As detailed above, we aim to run a series of equality campaigns to increase equality monitoring data and enable more accurate reporting across all protected characteristics. There will be a key focus on improving equality data during 2020-21. The next equality mainstreaming report is due to be published in 2021.

Work is also underway to refresh SQA's equality outcomes 2017-21 (detailed in the Equality Mainstreaming report detailed above). The 2017-21 Equality outcome 1 is related to SQA as an employer – "SQA has an increasingly diverse workforce that fully embraces equality, diversity and respect for all resulting in benefits for all staff and the wider society". Progress against equality outcome 1 is monitored via the HR Equality sub-group which meets quarterly.

The refresh of the equality outcomes is a priority within the HR operational plan in 2020.

In addition, the people survey includes questions which enable the organisation to measure colleague engagement and understanding of equality and diversity matters.

Further action to reach our objective

Further action has been outlined within the responses above. In summary, the main actions we plan to take include the following:-

- Sign up to the Race at Work charter – appoint an Executive sponsor for race to provide visible leadership on race and ethnicity in the organisation and drive key actions
- Encourage the establishment of a BAME network
- Run a series of equality campaigns to encourage the completion of equality and diversity data – work on this is already under way with our HR Equality Sub Group – this will help inform the review of the equality outcomes in 2021
- Develop a positive action plan to improve equality and diversity in the workplace. The Race at Work Charter and establishment of a BAME network will form part of this plan.

The Committee also requested our response to the following questions:

a. How does your organisation work together with schools, colleges and universities to help people from minority ethnic communities move into your work place?

Target areas for the recruitment of Modern Apprentices/Interns have been expanded beyond central Glasgow and Edinburgh to include underprivileged areas which are more likely to include a diverse population. Our Organisational Development & Change team work closely with Developing the Young Workforce.

b. How does your organisation encourage more people from minority ethnic communities to apply to work in your organisation?

We acknowledge that further work is required in this area. As mentioned above, we are currently investigating the opportunity to sign up to the Race at Work Charter which it is

hoped will form part of an action plan to increase ethnic minority representation across the organisation.

c. What support does your organisation give to retain people from minority ethnic communities in your organisation? For example, women returning to work or opportunities for progression.

The draft equality policy outlines that promotion opportunities will be monitored to ensure equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.

The policy also outlines that all benefits, terms and conditions of employment and facilities available to staff will be reviewed on a regular basis to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the special needs of disadvantaged or under-represented groups.

This policy is subject to consultation with the trade unions and is not yet live. It is, however, a priority policy for the organisation.

Our flexible working policy supports people in all circumstances, including women returning from maternity, people caring for dependants and others. We also have two key performance indicators to promote flexibility in employment, one for existing employees and another for preparedness to consider flexible arrangements for candidates.

d. How does your organisation deal with racism and discrimination in the workplace?

For example, does everyone know their responsibilities?

As indicated, SQA is currently undertaking a review of all HR Policies. The first tranche includes the Equality policy and Dignity at Work policy. Both policies outline the responsibilities of employees, managers, trade union representatives and the executive management team and the steps which will be taken regarding racism and discrimination in the workplace.

The draft Dignity at work policy specifies the following:-

“This policy describes our commitment to providing a working environment free from bullying and harassment where everyone is treated with dignity and respect and everyone takes personal accountability for their actions. There is no place for any form of bullying or harassment within SQA and everyone must adhere to this policy at all times. We will always address bullying or harassment and it will never be acceptable or tolerated at SQA. We believe such behaviour is unacceptable and it is contrary to

our values and we expect everyone to consistently treat others with consideration, courtesy and respect.”

Any breach is thoroughly investigated and appropriate action follows.

e. What initiatives or training and development opportunities does your organisation have to encourage a diverse workforce?

We already have in place a Diversity & Inclusion module as part of our Line Manager Programme. The modules on this programme are open to all staff including aspiring line managers to encourage a pro-active approach. This module is then explored further in our Line Manager only workshop where we agree practical activities to encourage creating a diverse team and ensuring all voices are heard and all talent is included. We also include diversity and inclusion as a key theme in our Line Manager clinics.

It is mandatory that all promoted line managers complete this module, new line managers to SQA is advised to draw on their previous experience and complete this module and existing line managers are asked to complete this module and build on their experience.

As part of the Values Led Leadership Programme we put an emphasis on authenticity, psychological safety and how comfortable people are in bringing their whole selves to work. The leaders are encouraged to consider how they can create an inclusive environment for their teams where everyone can feel comfortable in being who they are, and where everyone’s talent is appreciated and recognised.

As mentioned previously, we are currently exploring opportunities for additional employee network groups, including a BAME network.

If you have any queries regarding the above, please do not hesitate to contact me.