Full Equality Impact Assessment (EqIA)

## Skills Development Scotland has a legal duty to consider the impact of any new ‘policy’ on equality groups. A ‘policy’ in this context is taken to mean any new activity, function, policy or product, essentially anything that SDS does. Assessing impact includes considering relevant evidence, including evidence received from equality groups and the likelihood of a positive or negative impact on equality groups of introducing that new product, project or policy. The final section of this form requires us to think about how negative consequences can be mitigated against or removed, and how potential positive impacts can be encouraged. Equality impact assessment helps SDS meet its obligations under the Equality Act 2010. In addition, SDS took the decision to use the impact assessment process to make progress as a Corporate Parent in relation to care experienced young people, which is a component part of the Children and Young People (Scotland) Act 2014. The process might also be used to consider other groups that SDS has evidence of experiencing discrimination or underrepresentation.

For more detailed information about equality impact assessment, please see EHRC guidance here:

<https://www.equalityhumanrights.com/en/publication-download/assessing-impact-and-public-sector-equality-duty-guide-public-authorities>

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| **Name of EqIA** (e.g. directorate, large project or service) | Quality Policy 2023 |
| **Senior Responsible Officer (SRO):** name and job title | Julie Riley, Head of Quality Assurance and Improvement |
| **Does your project link to any other** [**published EqIAs**](https://www.skillsdevelopmentscotland.co.uk/publications-statistics/publications/?page=1&topic%5b%5d=3-6&order=date-desc)**?**  If so please provide the name of the EqIA (e.g. WBL) | All published Equality Impact Assessments that relate to the delivery of products and services\*. Also the ICIA for the SDS Gaelic language plan.  \*Quality should be embedded in all SDS Policies and Projects and as such all EQIAs could have a link to this Quality Policy EQIA.  The scope of the Quality Policy EQIA is the quality governance arrangements maintained by the Quality Assurance and Improvement Team (QA&I) Team. Where other teams implement those quality arrangements in the course of their work, they will undertake their own EQIA & ICIA for that specific activity where appropriate (e.g. Work Based Learning EQIA & ICIA) |

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| **Approved by:** | **Director of:** | **Date approved:** | **Review date:** |
| Signed: | Human Resources | 26th September 23 |  |

1. **Purpose of project, policy or product**

Provide details of what is being impact assessed below, including the target audience for this project:

The purpose of the Quality Policy is to define what quality means within SDS and the underlying principles, arrangements and resources that will guide us to achieve quality. The policy outlines how SDS staff are responsible, through their day-to-day work, for the organisation wide achievement of quality.

In relation to this assessment, the QA&I Team have aimed to ensure that the language of the Quality Policy is accessible and digestible to all colleagues some of whom will have protected characteristics.

The Quality Policy in SDS is aligned to the EFQM Model which in turn incorporates the UN Sustainable Development Goals “Gender Equality and “Reduce Inequalities” and the Scottish Government’s National Islands Plan.

1. **Evidence and Impact**

This section should consider the impact of your large project/directorate on each of the equality groups in turn. The [Equality Evidence Review](https://skillsdevelopmentscotland.sharepoint.com/sites/IShare/Connectcontent/Resource%20Library/Forms/NotArchived.aspx?id=%2Fsites%2FIShare%2FConnectcontent%2FResource%20Library%2FHR%20%5E%2FCulture%20and%20Standards%2FEquality%2C%20Diversity%20and%20Inclusion%2FEquality%20Mainstreaming%20report%5FEquality%20Evidence%20Review%5FJune%202019%2Epdf&parent=%2Fsites%2FIShare%2FConnectcontent%2FResource%20Library%2FHR%20%5E%2FCulture%20and%20Standards%2FEquality%2C%20Diversity%20and%20Inclusion&p=true&cid=90e8ed31-d77d-4e91-9365-940facfb6e8e) has information on school, Further/Higher education and employment for different groups. Think about the **actions** required. They will be collated on the action plan in the next section. Please add rows, as required.

Each section should include:

* **a context** – outlining how your project/service relates to this protected characteristic, e.g. population statistics
* **evidence of positive or negative impact** – outlining the potential disadvantage or barriers faced by this equality group
* **source of evidence** – evidence used, including any consultation
* **activity to date** – outlining what we have already done to address disadvantage or promote equality
* **further activity required** – outlining what we’ll do to proactively promote equality and address any potential barriers
  1. **Age**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of age, the knowledge required to understand and uphold quality arrangements within their day to day work | No specific Consultation. SDS Equality & Diversity Mainstreaming Report 2021 – 2025. Appendix Annex A1: SDS Employee Data by Age | Opportunities to get involved in Quality related activity are available to colleagues of all ages. QA&I team encourage teams to pick colleagues from a range of job roles when choosing participants for Quality Improvement Teams to support self evaluation which will include staff with a range of ages and experience. We have also included a specific ask of teams to consider protected characteristics when inviting participation onto their Quality Improvement Team. All new staff receive the SDS induction which provides an outline of quality in SDS as covered by the Quality Policy and this induction will be inclusive to all age groups and seniorities. | QA&I have developed a new section in the Licence to Practice mandatory training for People Managers that covers that cohort of staff regardless of their Age.  Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |

* 1. **Disability**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of disability the knowledge required to understand and uphold quality arrangements within their day to day work.  Staff experiencing disabilities or long-term health issues are uniquely placed to empathise with customers experiencing the same issues and thereby generate value adding Areas for Improvement. | No specific Consultation. SDS Equality & Diversity Mainstreaming Report 2021 – 2025 Annex A2: SDS Employee Data by Disability. | Opportunities to get involved in Quality related activity are available to disabled colleagues. QA&I do not know of colleagues’ disabilities unless they disclose them but we are always mindful of issues such as access and dietary requirements when organising events or training. We ask about dietary requirements and access issues as standard on invitations to training and events organised by QA&I. | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |
|  |  | The QA&I Teams training is based on a coaching approach which should identify barriers to engagement in a respectful and confidential way. Maintaining the option for virtual and hybrid coaching and training sessions should encourage the removal of any barriers to disabled colleagues’ full participation in quality related activities and roles in SDS. For example, auditory disabilities could be assisted by captioning available on MS Teams and the production of QA&I videos with voice overs may assist visually impaired colleagues. |  |

* 1. **Gender reassignment** (sometimes under heading of Transgender)

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of gender the knowledge required to understand and uphold quality arrangements within their day to day work | Annex A7: SDS Employee Data by Gender Reassignment | Encouraging QA&I colleagues to share their pronouns in order to create a safe and inclusive space for all for instance during staff training, events and other quality related activities.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates UN Sustainable Development Goal ‘Gender Equality’ | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |

* 1. **Marriage and civil partnership**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of marital status the knowledge required to understand and uphold quality arrangements within their day to day work | No staff data on marriage and civil partnerships is included in the SDS Equalities mainstreaming report | Colleagues’ Marital status is not a factor that would impact their experience of participating in quality related activity.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates UN Sustainable Development Goal ‘Gender Equality’. | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |

* 1. **Pregnancy and maternity**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of their pregnancy or maternity status the knowledge required to understand and uphold quality arrangements within their day to day work. | Pregnancy and maternity data is not reported in the Equality Mainstreaming report | QA&I team offer QIL and Facilitator opportunities to pregnant colleagues and offer refresher training to colleagues who have not participated in these roles for a while due to, for example, a maternity leave period.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates UN Sustainable Development Goal ‘Gender Equality’. | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |

* 1. **Race**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of their race the knowledge required to understand and uphold quality arrangements within their day to day work.  BME staff are uniquely placed to empathise with BME customers and thereby generate value adding Areas for Improvement. | No specific Consultation. SDS Equality & Diversity Mainstreaming Report 2021 – 2025 Annex A3: SDS Employee Data by Ethnicity | while all races are treated the same via QA&I processes, we recognise that there is a potential for difficult discussions and ensure that quality reviews, events and training are safe spaces for discussion and that participants must be respectful. We often formally agree ground rules to facilitate and encourage respectful debate.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates the UN Sustainable Development Goal ‘reduce inequality’ | Incorporate religious festivals and religious observations into all team planners so as to be sensitive to these dates when arranging training or events and activities.  Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |

* 1. **Religion or belief**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of their religion or belief the knowledge required to understand and uphold quality arrangements within their day to day work. | No specific Consultation. SDS Equality & Diversity Mainstreaming Report 2021 – 2025 Annex A4: SDS Employee Data by Religion | The QA&I team are always mindful of issues such as dietary requirements associated with religion or belief when organising events or training.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates the UN Sustainable Development Goal ‘reduce inequality’ | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics.  Incorporate religious festivals and religious observations into all team planners so as to be sensitive to these dates when arranging training or events and activities. |

* 1. **Sex** (or gender)

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of their sex the knowledge required to understand and uphold quality arrangements within their day to day work. | No specific Consultation. SDS Equality & Diversity Mainstreaming Report 2021 – 2025 Annex A8: SDS Employee Data by Sex | Colleagues sex or gender could have inadvertent impacts on their experience of participating in quality related activity. QA&I aims to set the conditions for safe and respectful debate during quality events, reviews and training.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates the UN Sustainable Development Goal ‘reduce inequality’ | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |

* 1. **Sexual orientation**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of their sexual orientation the knowledge required to understand and uphold quality arrangements within their day to day work. | No specific Consultation. SDS Equality & Diversity Mainstreaming Report 2021 – 2025 Annex A6: SDS Employee Data by Sexual Orientation | Colleagues’ sexual orientation could have inadvertent impacts on their experience of participating in quality related activity. QA&I aims to set the conditions for safe and respectful debate during quality events, reviews and training.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates UN Sustainable Development Goal ‘Gender Equality’. | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including those colleagues with protected characteristics. |

* 1. **Island Community Impact Assessment**

This section covers our commitments under the Islands (Scotland) Act 2018. This follows the same process as the rest of the form. Please see [Scottish Government Toolkit](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.scot%2Fpublications%2Fisland-communities-impact-assessments-guidance-toolkit%2F&data=04%7C01%7CJordon.Gorevan%40sds.co.uk%7Ced2dcd52cc474134145d08d8c9e79135%7C33ca6d475e4f477484f1696cbb508cbe%7C0%7C0%7C637481343690991575%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=9NJwzexZG%2BaGREDjlY74Av%2BP6deY2Z0NC2uORMZa16M%3D&reserved=0) for more information. If you feel a more detailed analysis of impact on Island Communities of your project or policy, please contact [islands@sds.co.uk](mailto:islands@sds.co.uk)

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| The Quality Policy is equipped to provide all SDS employees regardless of their location the knowledge required to understand and uphold quality arrangements within their day to day work. | No specific Consultation however feedback is gathered from Quality Improvement Leads (QILs) and Facilitators as well as staff involved in corporate quality activities throughout the year. All staff also have the opportunity to provide feedback on corporate quality arrangements via the Internal Support Services Survey | Colleagues’ living in island communities could have inadvertent impacts on their experience of participating in quality related activity. QA&I aims to ensure that staff based in island communities are able to participate in corporate quality arrangements in ways that work for them. We now offer online/remote/hybrid as well as face to face access to quality related activities such as self evaluations, QILs & Facilitator training, focus groups, briefings, coaching sessions, external inspections. We are also aware that island based teams may be smaller and therefore may need additional resources such as a QIL to help them engage in quality related activities.  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates the UN Sustainable Development Goal ‘reduce inequality’ | Continue to engage with island based teams to develop the best approaches for them to access, engage in, and embed quality arrangements and activities. |

1. Assessing impact on other groups

This section is the same as above only considers the impact of groups not covered in the Equality Act (2010), e.g. care experience, carers, socio-economic disadvantage). Add sections as required.

* 1. **Care experience**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| Care experienced staff are uniquely placed to empathise with care experienced customers and thereby generate value adding Areas for Improvement. The Quality policy aims to be inclusive and engage all staff regardless of their background. | SDS Equality & Diversity Mainstreaming Report 2021 – 2025 Annex A5: SDS Employee Data by Care Experience | The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates the UN Sustainable Development Goal ‘reduce inequality’ | Encourage Quality Improvement teams to be inclusive and encourage participation from staff with diverse backgrounds including care experience. |

* 1. **Add additional factors as needed**

**Context:** After consideration it has been determined that this is not a factor that would affect an individual’s ability to engage in or carry out quality arrangement or activities related to their job roles.

| Evidence of positive or negative impact | Source of evidence | Activity to date | Further activity required |
| --- | --- | --- | --- |
| Geographical Inclusion is encouraged and any negative impact of travel on carers or those with health conditions is mitigated by offering teams the option of hybrid self evaluations (face to face and virtual) | SDS Team Self Evaluations  QA&I Training Offer | Hybrid Self Evaluation are currently being piloted  The Delivering Excellence Framework is aligned to the EFQM 2020 Framework which incorporates the UN Sustainable Development Goal ‘reduce inequality’ | Monitor uptake of remote and hybrid options for self evaluations, training, briefings, coaching, inspections & reviews |

1. **Action Plan**

The SRO is responsible for all actions. Throughout the EqIA process you will have identified actions which need to be taken forward. These actions should be added to your workplan and Risk Register where appropriate. Some examples of action you may have identified throughout the EqIA process are:

* Build in equality monitoring / evaluation
* Make amendments to your policy
* Build in additional support mechanisms to your policy if required
* Consult with staff, customers or stakeholders
* Involve staff/customer groups in developing aspects of your policy

| **What is the action?** | **Which group(s) does it relate to?** | **What is the anticipated outcome?** | **What method is used to measure it?** | **Timescale** |
| --- | --- | --- | --- | --- |
| Review all documentation to ensure consistency and compliance with the SDS Visual Identity Guidelines (e.g. SDS Delivering Excellence Framework, Training materials produced in PowerPoint, Team Evaluation Document Template, Self Evaluation Guidance etc.). Provide quality guidance to staff in a variety of formats e.g. video recordings. | All Groups | The Quality Policy is readable/ accessible and a translation would be provided on request.  No group is disadvantaged by the QA&I team producing quality related guides, templates etc. covered by the Quality Policy.  The QA&I team are mindful of the accessibility of their resources to the visually impaired, colour blind and dyslexic to name just a few groups of staff who would be covered by and implementing the quality policy. The QA&I team seek to move beyond compliance with the Visual Identity Guidelines for documents to consider engaging ways of communicating information which will suit employees with different learning styles such as the introduction of recorded videos. | QA&I compliance check with SDS Visual identity guidelines when new content is created for staff -as these guidelines are agreed to make documentation accessible when followed  Feedback from staff gathered, for example, as part of the self evaluation feedback questionnaire. This questionnaire has open questions which would allow staff to raise any equality related concerns.  Determining the needs and preferred learning styles of staff through interactions on for example the dedicated Teams Channel for QILs and Facilitators. | Full review and update of all resources for accessibility/ digestibility at least every two years. |
| QA&I Team to encourage participation in Quality related activity from as broad a staff grouping as possible.  we are keen to have representation form across all protected groups to ensure our quality improvement team can bring real value to ensuring inclusion is built in | All Groups | Teams undertaking Self Evaluations are prompted by the QA&I Team to consider protected characteristics as well as the role and grade mix of the participants invited onto their Quality Improvement Team. Protected characteristics are not indirectly discriminated against by exclusion from these groups. | Introduce a question to the self evaluation feedback questionnaire “ Did you consider protected characteristics when forming your Quality Improvement Team?”  Introduce a prompt to the Self Evaluation Guidance encouraging teams to consider protected characteristics when identifying participants on their Quality Improvement Team. | Review every two years |
| Encourage colleagues to share their pronouns if they wish to do so. Create a safe space by QA&I team sharing their pronouns when they begin introductions at staff training or other events they are leading. | Gender reassignment | QA&I Team less likely to mis-gender staff at quality related staff training and encourage a supportive and inclusive training environment | Feedback questionnaire for quality related staff training | Review annually |
| Continue to engage with island based teams to develop the best approaches for them to engage in and access quality arrangements and activities. | Staff based in Island communities | Geographical barriers to participation in Quality related activity are eliminated. | Monitor uptake of remote and hybrid options for self evaluations, training, briefings, coaching, inspections & reviews | Review annually |
| Update of the Leadership Team Evaluation Document to include consideration of Care Experienced staff and staff with protected characteristics | Care experienced staff, all protected characteristics and staff in Leadership roles. | Leadership Self Evaluations have a robust discussion about staff with protected characteristics and care experience which may lead to areas for improvement being identified by the Leadership Teams in relation to eliminating barriers and promoting opportunity for these staff. | Leadership Self Evaluation Action Plans | Review every two years |
| Encourage all team planners to include dates from the SDS calendar of religious festivals and religious observations | Colleagues with the protected characteristic of religion or belief. | Quality related activity such as self evaluations are not arranged for a time which clashes with religious festivals which may be a barrier to their participation as they may be on leave, fasting or other devotional activity. | QA&I tracker. Monitor how many QA&I activities clash with religious festivals. | Review Annually |
| QA&I are developing a new section in the Licence to Practice mandatory training for People Managers in development that covers that cohort of staff regardless of their Age. | People managers | People managers consider the impact on protected groups of quality activities within their team | QA&I analysis of feedback on the module when published on the Academy | Review Annually |
| Monitoring the Corporate compliance with EQIAs associated with changes to all SDS products and services | All protected characteristics | The roll-out of EQIAs for products and services is monitored and any gaps in deployment are identified and escalated. | Quality and HR Compliance Heatmap – completed and published and EQIAs by Directorate. | Updated quarterly |