

Equality Impact Assessment (supporting guidance available)

Summary

Name of Policy or practice	Reasonable Adjustments Passport		
New Policy or Revision	New practice		
Policy Owner (role)	HR Reward and Equality Manager		
Date Policy Owner Confirmed Completion	September 2024		
Agreed Schedule Review Date	October 2026	Additional review date (Action review date)	October 2025

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.

Explain how you will monitor and record the actual impact on equality groups, including how the evidence can be revisited to measure the actual impact.

Required Actions	Owner	Date	Comment & Review
Actions taken to monitor the implementation of policy and the impact on equality groups (evidence and consultation)			[ONGOING RECORD]
We will review the Reasonable Adjustments Passport 12 months after implementation and thereafter every 2 years. If successful we will consider developing the Reasonable Adjustments Passport for wider for example for employees going through menopause, for employees who are transitioning from one gender to another and for employees who may require reasonable adjustments due to caring responsibilities.	Reward and Equality Team/ Research & Evaluation Team	October 2025	
People and Culture Group endorsed the Passport at their December 2023 Meeting It was also discussed with Trade Unions in December 2023	Reward and Equality Team/JEF	November/December 2023	Passport was endorsed in 2023, and discussed with TUs.

Identified Actions	General Equality Duty	Owner	Date	Comment & Review
[LIST]	[CROSS REFERENCE]			

Policy Aims

What is the rationale for this policy or practice?

We have a legal obligation under the Equality Act 2010 to make reasonable adjustments for employee's who have a disability. Reasonable adjustments are changes an employer makes to remove or reduce a disadvantage related to someone's disability. For example:

- making changes to the workplace
- changing someone's working arrangements
- finding a different way to do something
- providing equipment, services or support

Reasonable adjustments are specific to an individual person. They can cover any area of work.

Employees are required to contact HR and reasonable adjustments are put in place in agreement with the employee and line manager but when the employee has a new line manager or moves roles within SQA, this process is repeated.

Prior to lockdown in 2018/19, there had been discussions at the Disability Network regarding developing a Reasonable Adjustment Passport for SQA. The rationale was to use this as a tool to support discussions between manager and employee regarding any reasonable adjustments they might require. Disabled employees have told us that explaining their disability and what they might require can often be retraumatising for them. The purpose of the passport would both be to support discussions between the employee and manager but also mean that if the employee moves to a new area within the business or has a new manager, they do not need to retell their disability journey as the information is already recorded.

There are a range of organisations that have a Reasonable Adjustment Passport in place – Fujitsu and Greater Glasgow NHS to name two quite different organisations. It is generally felt that it would be positive, people-centred development for SQA too.

The Disability Network sponsor supported the concept and suggested a Short Life Working Group (SLWG) as the way forward.

The aims of the SLWG were as follows:

- To develop a streamlined, user friendly Reasonable Adjustment Passport
- To plan out a process for using a Reasonable Adjustment Passport at SQA
- To investigate if the use of a Reasonable Adjustment Passport could/should be supported by Business World.

The members of the SLWG included employees from across the organisation and representatives from the Disability Network with lived experience.

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

Benchmarking was completed by doing an initial internet search where a range of organisations were examined, including TUC, ACAS, CIPD, NHS and a range of universities. We sent benchmarking requests to Scot Gov and several NDPBs in the hope of getting some insight as to what is going on in organisations similar to our own – We got several responses from organisations very interested in the concept of Reasonable Adjustment Passports but no one who had implemented one.

The following organisations were benchmarked against:

- NHS
- CIPD
- Scottish Government
- Several Non-Departmental Public Bodies
- Several NHS organisations

We could not find any formal research on the effectiveness of a Reasonable Adjustments Passport, however anecdotal evidence from disabled people indicate that this would be a positive and supportive move. The implementation of this would allow us to evaluate the effectiveness of the passport and if successful implement the passport for the new qualifications body.

From our most recent Workforce Equality Monitoring Report we have 83 employees (8.01% of all staff) who have declared a disability. National evidence suggests around 24% of individuals of working age are disabled.

What are the aims of this policy or practice?

The purpose of the passport is a tool for individuals to capture all agreed workplace adjustments. The aim is to minimise the need to re-negotiate workplace adjustments every time an employee moves post, moves between departments, or is assigned a new line manager. Completion of the passport is voluntary. The employee has control over the content, including updating and deleting the content. This Reasonable Adjustment Passport belongs to the employee who can share a copy with their line manager, but it cannot be shared by others without the employee's permission.

In the first instance the passport is going to be piloted with employees who have a disability. However, from our benchmarking, there are wider uses of the passport, for example for employees going through menopause, for employees who are transitioning from one gender to another and for employees who may require reasonable adjustments due to caring responsibilities.

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

This is a positive document for both employee and employer and aims to:

- Provide employees and their line managers with the basis for discussion.

The passport allows the employee, to:

- Explain the impact of their disability at work.

The passport allows the line manager to:

- Understand how the employees' circumstances might impact them at work.
- It is for anyone who has personal circumstances (e.g., disability or health condition) that they feel is or may affect their work.
- It is intended to support productive conversations and is not intended to be a stand-alone paper-based exercise. The value is in the conversations between individual and line manager.
- The success of discussions will be dependent on a mutually open, honest, and respectful conversation.

Evidence, Consultation and Engagement

What stakeholders have you engaged with in the development of this policy or practice?	
<p>In addition to the benchmarking discussed above, a short life working group was developed to explore and develop a Reasonable Adjustments Passport. This group consisted of a range of staff from across the organisation, including staff with lived experience of disability.</p> <p>Members of the Reasonable Adjustment Passport SLWG</p> <ul style="list-style-type: none"> • Head of Chief Executive’s Office (Sponsor of Disability Network) • HR Advisor - Reward (Chair) • Programme Delivery Manager • Responsible Business Officer • HR Advisor • Senior Strategy Manager • Employee Development Programme Manager • People Systems Support Analyst • Disability Network members <p>The draft Equality Impact Assessment has also been presented to the People and Culture Group for consultation and feedback. The Reasonable Adjustments Passport was endorsed by the People and Culture Group in their December meeting, it was also discussed with Trade Union colleagues in their December meeting as part of the equality impact assessment process.</p>	
What evidence about equality groups do you have to support this assessment?	
<p>Age</p>	<p>Disability can occur at any age; however, the prevalence of disability rises with age: in 2021/22 around 11% of children in the UK were disabled, compared to 23% of working age adults and 45% of adults over State Pension age. https://commonslibrary.parliament.uk/research-briefings/cbp-9602/#:~:text=The%20prevalence%20of%20disability%20rises,reported%20a%20disability%20(58%25).</p> <p>In SQA, 64.29% or more of staff are between the ages of 35 and 59 with 12.9% of staff being in the over 60 age group. It is also interesting to note that there has been an increase in the 60-64 age group and an increase in the 65+ group. It would therefore be prudent for us to ensure we have the support in place for an older workforce who may have increased levels of disability. https://www.sqa.org.uk/sqa/files_ccc/equalities-2023-workforce-monitoring.pdf</p>

<p>Disability</p>	<p>In SQA the percentage of staff declaring a disability has increased by 2.54% to 8.01% of all staff (between 2019 and 2022). Due to low numbers declaring a disability, we are not able to report on intersectional identities but have examined wider evidence in relation to this.</p> <p>https://www.sqa.org.uk/sqa/files_ccc/equalities-2023-workforce-monitoring.pdf</p> <p>The three most frequent disability types in 2021 and 2022 by those declaring they have a disability, noted in the SQA Workforce Monitoring Report are:</p> <ul style="list-style-type: none"> • mental health difficulty • long-term illness, disease, or health condition and • deaf or hearing impairment <p>In relation to mental health, 1 in 4 employees may experience mental ill health. Recent research indicates that three out of 4 people who experience mental ill health will also experience stigma. The Reasonable Adjustments Passport may be a positive move in relation to employees being supported to discuss mental ill health.</p> <p>Like many organisations there may be underreporting in this area, and it is hoped that the Reasonable Adjustments Passport may encourage a higher declaration of disability. The latest estimates from the Department for Work and Pensions' Family Resources Survey indicate that 16.0 million people in the UK had a disability in the 2021/22 financial year. This represents 24% of the total population.</p> <p>The proportion of the population reporting a disability has risen by six percentage points since 2002/03, up from 18%. Most of this increase has been observed over the past decade, with disability prevalence up by five percentage points from 19% in 2010/11.</p> <p>https://commonslibrary.parliament.uk/research-briefings/cbp-9602/#:~:text=The%20prevalence%20of%20disability%20rises,reported%20a%20disability%20(58%25).</p> <p>In 2021, an estimated 407,400 disabled people aged 16 to 64 were in employment in Scotland. The employment rate for disabled people aged 16 to 64 was estimated at 49.6 per cent. This was significantly lower than the rate for non-disabled people (80.8 per cent). Therefore, the disability employment rate gap was estimated at 31.2 percentage points. This represents a statistically significant gap.</p> <p>https://www.gov.scot/publications/scotlands-labour-market-people-places-regions-protected-characteristics-statistics-annual-population-survey-2021/pages/8/#:~:text=Whereas%2C%20the%20employment%20rate%20for,rate%20for%20disabled%20people%20increasing</p>
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	In addition, we have the above benchmarking exercise and discussions with our employees who have lived experience of disability to inform the rationale behind the reasonable adjustment's passport.
Race	<p>While disability can impact across all backgrounds and cultures, men, and women men from Pakistani and Gypsy/Traveller ethnicity groups- recorded higher rates of 'health problem or disability in comparison to white peers. Women from Bangladeshi backgrounds also reported higher rates of disability in comparison to white peers. It may then be especially supportive to groups who experience greater rates of disability.</p> <p>https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2015/08/ethnic-groups-poorest-health/documents/analysis-health-inequality-ethnicity-scotland/analysis-health-inequality-ethnicity-scotland/govscot%3Adocument/00484303.pdf</p>
Religion or Belief	Disability can impact on any protected characteristic
Sex	<p>There is further evidence that women experience greater disability and comorbidities and generally spend fewer years in good health than men. In Scotland, data from the Scottish Health Survey 2021 found that women are more likely than men to report living with a limiting long-term health condition.</p> <p>In SQA, we have 62.16% female and 37.84% males. There is therefore an increased probability that we may require to support more females than males in relation to a disability.</p>
Sexual Orientation	<p>There is evidence to suggest that there are higher rates of mental ill health amongst the LGBT+ population in comparison to the heterosexual population. This is often due to experiences LGBTIQ+ people go through that can affect their mental health, such as discrimination, homophobia or transphobia, social isolation, rejection, and difficult experiences of coming out.</p> <p>https://www.stonewall.org.uk/system/files/lgbt_in_britain_health.pdf</p>
Gender Reassignment (Gender identity and transgender)	<p>If a trans employee has been diagnosed with a condition such as gender dysphoria, then they may also be protected by the disability discrimination provisions of the Equality Act, as long as the other criteria for a disability have been met.</p> <p>Research indicates trans and non-binary adults are more likely than the general population to experience long-term health conditions, including mental health problems, dementia and learning disabilities, and to be autistic.</p> <p>There is evidence to suggest that there are higher rates of mental ill health amongst the trans population in comparison to the general population. This is often due to some things trans people go through that can affect their mental health, such as discrimination, transphobia, social isolation, rejection, and difficult experiences of coming out.</p> <p>https://www.stonewall.org.uk/system/files/lgbt_in_britain_health.pdf</p>

Marriage/Civil Partnership	Disability can impact on any protected characteristic.
Pregnancy / Maternity	There may be instances where a pregnant employee may require short term reasonable adjustments to accommodate pregnancy related illness. https://www.acas.org.uk/managing-your-employees-maternity-leave-and-pay/if-theyre-ill-or-having-a-difficult-pregnancy
Care experience (Where relevant)	We do not gather care experience information at the moment within SQA. However, there are many research studies that evidence that care experienced individuals have a greater incidence of poorer mental and physical health. https://whatworks- https://www.nuffieldfoundation.org/wp-content/uploads/2021/10/The-lifelong-health-and-well-being-of-care-leavers.-Nuffield-Foundation-and-UCL-policy-briefing.-Oct-2021.pdf csc.org.uk/wp-content/uploads/Care-Leavers-Emotional-Wellbeing-Protocol.pdf

Impact and Opportunities for Action

The impact that a policy or practice has on an equality group may be different and this requires to be recorded. The impact may not always be negative. Actions are taken to address any differential impact, and include actions to mitigate against any negative impact, to advance equality and to foster good relations between groups.

Each section contains questions for each equality group. These questions are here to support consideration; however, you can provide further detail. Focus initially on the equality groups that would be affected by this policy. If you do not consider that certain equality groups would be affected by this policy, you may leave these sections.

Protected Characteristic	General Equality Duty
Age	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The impact is neutral for age in relation to eliminating unlawful discrimination, harassment, and victimisation. Advance equality of opportunity
	The impact is neutral for age in relation to advancing equality of opportunity. Foster good relations
	The impact is neutral for age in relation to fostering good relations.
	Protected Characteristic
Disability	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The probable or likely impact is positive in relation to eliminating unlawful discrimination, harassment and victimisation given the passport is a tool to support the conversation between manager and employee in relation to reasonable adjustments. The impact would be positive across a range of intersectional identities as described in the previous section. Advance equality of opportunity
	The probable or likely impact is positive in relation to advancing equality of opportunity for employees who require reasonable adjustments. The impact would be positive across a range of intersectional identities as described in the previous section. Foster good relations
	The probable or likely impact is positive in relation to fostering good relations between manager, employee, and the organisation as this will support discussion between employee and manager. The impact would be positive across a range of intersectional identities as described in the previous section.

Protected Characteristic	General Equality Duty
Race	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The probable or likely impact is neutral for race in relation to eliminating unlawful discrimination, harassment, and victimisation.
	Advance equality of opportunity
	The probable or likely impact is neutral for race in relation to advancing equality of opportunity.
	Foster good relations
	The probable or likely impact is neutral for race in relation to fostering good relations.
Protected Characteristic	General Equality Duty
Religion or Belief	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The impact is neutral for religion and belief in relation to eliminating unlawful discrimination, harassment, and victimisation
	Advance equality of opportunity
	Foster good relations
	The probable or likely impact is neutral for religion or belief in relation to fostering good relations.
Protected Characteristic	General Equality Duty
Sex	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The impact is neutral for sex in relation to eliminating unlawful discrimination, harassment, and victimisation. It may however have a positive impact on those experiencing menopausal symptoms that require reasonable adjustments.
	Advance equality of opportunity
	The probable or likely impact is neutral for sex in relation to advancing equality of opportunity. It may however have a positive impact on those experiencing menopausal symptoms who require reasonable adjustments.
	Foster good relations
	The probable or likely impact is neutral for sex in relation to fostering good relations. It may however have a positive impact on those who need to discuss reasonable adjustments with their manager due to menopausal symptoms.
Protected Characteristic	General Equality Duty

Sexual Orientation	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The impact is neutral for sexual orientation in relation to eliminating unlawful discrimination, harassment, and victimisation
	Advance equality of opportunity
	The probable or likely impact is neutral for sexual orientation in relation to advancing equality of opportunity.
	Foster good relations
	The probable or likely impact is neutral for sexual orientation in relation to fostering good relations.
Protected Characteristic	General Equality Duty
Gender Reassignment (Gender identity and transgender)	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The impact is neutral for gender reassignment in relation to eliminating unlawful discrimination, harassment, and victimisation. It may however be positive for individuals who require workplace adjustments as a result of gender reassignment.
	Advance equality of opportunity
	The probable or likely impact is neutral for gender reassignment in relation to advancing equality of opportunity. However, it may be positive to support the gender transition process.
	Foster good relations
	The probable or likely impact is neutral for gender reassignment in relation to fostering good relations. However, it may be positive for employees going through gender reassignment as it would support discussions between manager and employee.
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
	The impact is neutral for marriage and civil partnership in relation to eliminating unlawful discrimination, harassment, and victimisation
	Advance equality of opportunity
	The probable or likely impact is neutral for marriage and civil partnership in relation to advancing equality of opportunity.
	Foster good relations
	The probable or likely impact is neutral for marriage and civil partnership in relation to fostering good relations.

Protected Characteristic	General Equality Duty
Pregnancy / Maternity	Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
	The impact is neutral for pregnancy and maternity in relation to eliminating unlawful discrimination, harassment, and victimisation. However, it may be positive for an employee who has a pregnancy related illness.
	Advance equality of opportunity
	The probable or likely impact is neutral for pregnancy and maternity in relation to advancing equality of opportunity. However, it may be positive for an employee who has a pregnancy related illness.
	Foster good relations
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
	The impact is neutral for care experience in relation to eliminating unlawful discrimination, harassment, and victimisation.
	Advance equality of opportunity
	The probable or likely impact is neutral for care experience in relation to advancing equality of opportunity.
	Foster good relations
	The probable or likely impact is neutral for care experienced employees in relation to fostering good relations.

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.
No negative impacts identified.