EQUALITY IMPACT ASSESSMENT

Policy, practice, process or service title:	**Equality, Diversity and Inclusion Policy** (including equality data monitoring).
Policy, practice, process or service lead/ owner:	Equality, Diversity and Inclusion Lead/ HR Business Partner
Others involved in EqIA assessment group	Assessment group included: • EDI Lead With policy input from the Registry team and equality data input from HR Business Partners.
Policy, practice, process or service implementation date:	28/08/2023

1   **Framing the policy, practice, process or service**

1.1   **Briefly describe the outcomes, aims and purpose of the policy, practice, process or service:**

To set out SRUC's overarching commitment to equality, diversity and inclusion primarily focused on our responsibilities under equality legislation and key principles that guide supporting policies. The policy also lists groups of people that SRUC are committed to under the equality, diversity and inclusion umbrella (e.g. carers, people who are care experienced), over and above the protected characteristics set out in law. The policy sets out our commitment to equality and inclusion, definitions of discrimination, SRUC's role and responsibilities under this policy, embedding equality in policy development, data monitoring, and action where this policy is breached.

The policy was originally going to set out standardised equality monitoring questions and answer values however this will now be encompassed in a separate guidance document that supports this policy. That document will establish an institution-wide approach to gathering equality data for current and prospective employees, wider customers, and students either within the policy

itself or in a supporting document. The policy is also supported by the Equality Impact Assessment toolkit (guidance and form) that is already established.

1.2 Is the policy, practice, process or service new or being changed, reviewed or stopped?

Reviewed. Previous 'equal opportunities' policies for employees and students will be superseded by this policy.

1.3 Who is affected by this policy, practice, process or service?

Employees (including those applying to work at SRUC), students (including those applying to study with SRUC), contractors, suppliers, visitors, volunteers and wider SRUC customers/ stakeholders.

1.4 Are there any other SRUC policies that may be affected by this policy, practice, process or service?

The EDI Policy provides overarching principles and direction for policy development across SRUC. Specific supporting policies include**:**

Employees only
- Dignity at Work Policy
- Grievance and Disciplinary policies
- Other Human resources policies

Students only
- Safeguarding
- Fitness to study/Fitness to practice
- Maternity
- Student Support
- Mitigating Circumstances
- Reasonable Adjustments
- Student Discipline Policy
- Postgraduate Handbook and Code of Practice

General policies
- Acceptable Use of IDS Facilities
- SRUC Social Media Policy
- Data Protection Policy
- Public Interest Disclosure (Whistleblowing): Code of Practice and Procedure

2 Evidence relevant to the policy, practice, process or service including consultation

The information you gather in this section will:

- help you to understand the importance of your policy, practice, process or service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.1 Evidence: Set out in the table what you know about the experiences of people in terms of each equality group. Consider the diversity within each group (e.g. experiences of people from different religions or faiths) as well as the differences between groups. There may also be cumulative barriers experienced by people when you look at more than one group together (e.g. experiences of women of different minority ethnic groups, so the intersectional impact of sex and race).

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	**What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service?** Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
General/ all protected characteristics	1 Scotland Census Equality Impact Assessment 2 EHRC Equality Act 2020 Code of practice	Summarises work to ensure inclusivity of an online census and background to questions on Sex (remained binary), and inclusion of optional trans status/ history and sexual orientation question. Significant testing of census questions was undertaken to support good data gathering and understanding (1)

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	employercode.pdf (equalityhumanrights.com) 3 Edinburgh University staff data collection 4 HESA submissions 5 Scotland Census Paper questionnaire 6 Evidence and the Public Sector Equality Duty (EHRC) 7 Employee Information and the public sector equality duty (EHRC non–statutory guidance) 8 Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 and subsequent updates	Page 294 of the Code of Practice onwards provides some recommendations on data monitoring questions. Generally there is support to use monitoring questions and categories set out in national surveys like the Census. See reference to this under each protected characteristic below. (2). Other institutions appear to use HESA requirements (3) and both HESA (4) and Scotland Census (5) have been developed based on consultation and recognised good practice. EHRC guidance sets out useful GDPR considerations when collecting equality data noting the balance between asking for data and the likelihood of getting complete data that will be usable. Data must be processed as 'sensitive personal information' for the purposes of the legislation public authorities should not report or publish information in any way that makes it possible for an individual to be identified."(6) A listed public authority's mainstreaming report must include an annual breakdown of information gathered by the authority which has not been published previously in such a report on the composition of the authority's employees, as well as the recruitment, development and retention of people as employees of the authority with respect to, in each year, the number and relevant protected characteristics of such people, and details of the progress that the authority has made in gathering and using that information to enable it to better perform the general equality duty. Collecting information by routine monitoring through questionnaires or surveys may be the most effective way to gather employee information. It is good practice to make sure that employees are clear about why you are gathering the information and how it will be used. If you are able to demonstrate to your

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	9 EHRC non-statutory guidance and technical guidance 10 Review of similar policies in other institutions e.g. University of Strathclyde, Borders College, University of St Andrews, ACAS, University of Stirling) 11 Equality Act 2010	staff that you use this information to improve your performance, then they are more likely to respond. (7). The EHRC guidance appears to expect that information will be gathered across all the relevant protected characteristics but that "the employment monitoring information you collect should be proportionate to the size of your organisation and you should only gather information". Authorities are expected to work towards publication on race, disability, age and sex (all disaggregated by grade, working hours), and should be able to indicate representation by sexual orientation and religion or belief. (7). Regulations set out requirements for listed public authorities in Scotland including the duty to gather and use employee information in relation to the relevant protected characteristics.(8). EHRC guidance does not dictate the data that should be gathered per se and notes that are a number of ways to gather information about experiences across the employee journey There is some expectation that data on race, age, disability, and sex will be published with an indication of likely representation by sexual orientation, and religion and belief (9). A review of other HE/ FE Equality policies showed that common themes are to include relevant equality groups, roles and responsibilities, reference to relevant legislation (specifically the Equality act 2010) and institutional commitment to EDI and tackling discrimination (10). The Equality Act 2010 sets out the nine protected characteristics, the public sector equality duty which SRUC is subject to, and definitions of different kinds of discrimination alongside the relevant protected characteristics (11).

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Age	1 Advance HE 2 EHRC Equality Act 2020 Code of practice employercode.pdf (equalityhumanrights.com) 3 SRUC 2021 equality outcomes report 4 Equality Act 2010	External guidance suggests using date of birth where possible or the option of age brackets starting at 19 or under, 20-24 years, 25-29 years and so on to 65+ (1). EHRC comments that this protected characteristic may not be as controversial to gather data on than some of the other protected characteristics. Using age bands can be useful where date of birth is not appropriate (2). In 2021, SRUC reported 100% on employee age profile using 5 years age bands after age 16-19 years. We also report on progress through recruitment by age using age bands (3). Age is a protected characteristic under equality legislation (4) and is included in SRUC's equality impact assessment toolkit.
Disability	1 Advance HE 2 EHRC Equality Act 2020 Code of practice employercode.pdf (equalityhumanrights.com) 3 Evidence and the Public Sector Equality Duty (EHRC)	Page 12 sets out their views on guidance notes and question/ answer options which acknowledge that the advice is different from the format used in the UK Censuses. The format presented provides examples of conditions for each category whereas the census formats rely on self-identification. Optional follow up questions to ask about reasonable adjustments is also provided (1). In Scotland, institutions have a responsibility under the British Sign Language (Scotland) Act 2015 to improve services for BSL users and Advance HE provide a recommended question and answer set (1).

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	4 SRUC 2021 equality outcomes report 5. Equality Act 2010	EHRC note that disability can be sensitive data to collect and suggests ensuring organisations clearly explain the reason for collecting this data and its use. Gathering data for monitoring purposes before a job offer is not unlawful (2). Disaggregating information simply in terms of whether people are disabled or not is unlikely to give a very complete picture of the disabled people within your workforce etc. It may be more useful to gather information about different types of disability (3). Disability is a protected characteristic under equality legislation (5) and is included in SRUC's equality impact assessment toolkit. In 2021 SRUC reported on the number of people who has responded as 'disabled', 'non-disabled', 'prefer not to say' and 'no response'. We also reporting on progress through recruitment by disability (4)
Race	1 Advance HE 2 EHRC Equality Act 2020 Code of practice employercode.pdf (equalityhumanrights.com) 3 SRUC 2021 equality outcomes report 4. Equality Act 2010	Suggestion to list answer options alphabetically. Acknowledgement that proposed question/ answers are UK-centric and therefore overseas students may not find an answer option that suits them. Institutions are currently required to return both staff and student nationality data to HESA. However, nationality defines the country of one's legal nationality, which is not necessarily one's domicile. For this reason, HESA also collects data on domicile.(1) EHRC recommend using Census categories or matching them very closely. Subgroups offer wider choice to people and organisations should closely

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		monitor changes to the way people classify themselves and review their own categories accordingly (2). In 2021 SRUC reported on our ethnicity profile and aggregated responses to 'UK White', 'Other white', 'BME', 'other ethnic background', 'not known, 'prefer not to say', and 'no response' We also report on leaver profile by ethnicity (3). Race is a protected characteristic under equality legislation (4) and is included in SRUC's equality impact assessment toolkit.
Sex	1 Scotland's Census 2022: sex question guidance | Scotland's Census (scotlandscensus.gov.uk) 2 Advance HE 3 EHRC Equality Act 2020 Code of practice employercode.pdf (equalityhumanrights.com) 4 Getting equalities monitoring right – Stonewall and Scottish Trans	Scottish Government guidance is provided on answering the 2022 census question on 'sex' (1) Conflating gender identity and sex may cause confusion and could lead to challenges on the basis that the data being collected and the decisions being taken on the back of that data do not give due regard to the specific issues which arise on grounds of sex and/or gender identity. If distinct questions are asked in relation to sex and gender identity, then arguably all experiences are being captured and in the event of challenge, institutions will be better positioned to demonstrate that the approach being taken is a proportionate means of achieving a legitimate aim as well as allowing more details to be gathered from the data (2). EHRC notes monitoring of male and female categories is important as well as intersectionality with caring responsibilities and part-time working (3).

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	5 SRUC 2021 equality outcomes report 6 Scottish Government advice and guidance on sex, gender identity, trans status – data collection and publication (2021) 7. Equality Act 2010	Stonewall & Scottish Trans provide guidance on gather data on gender which includes 'in another way' option. (4). SRUC has reported 100% data coverage and currently has answer options 'female', 'male', 'other', 'prefer not to say', and 'no reply'. We reported on leaver profile by gender, and progress through recruitment (5) Scottish Government's Chief Statistician guidance states that organisations must decide on the most useful definition(s) to use to capture the data that they need and to capture data where there is a clear need to do so. The guidance suggests that it would be in a small number of instances (health, criminal context) that it would be proportionate to ask about someone's biological sex. Consideration also needs to be given to revealing a trans history that otherwise a person may want to keep private. The Scotland's Census 2022 question on sex and the voluntary question on trans status or history have been thoroughly tested, are respectful and offer a way to collect data on both sex and trans status. (6) Sex is a protected characteristic under the equality legislation (7) and is included in SRUC's equality impact assessment toolkit.
Gender Reassignment	1 Advance HE 2 EHRC Equality Act 2020 Code of practice employercode.pdf (equalityhumanrights.com)	When collecting data on gender identity, it is important that institutions report all categories covered in the answer options, even if these figures are suppressed following HESA's rounding methodology. Collecting data on "non-binary" but not reporting those could be perceived as effectively reducing the gender identity question to a binary reflection of sex. The term 'trans history' can refer to people who no longer identify as trans, but were registered the opposite sex at birth (ie they have transitioned) (1).

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	3 Getting equalities monitoring right – Stonewall and Scottish Trans 4. Equality Act 2010 5. case law:Taylor v Jaguar Land Rover Ltd	EHRC note this is a very sensitive area in terms of data gathering and the often negative experiences of transgender people. Data can help monitor barriers with policies however this needs to be balanced with confidentiality (2). Stonewall & Scottish Trans recommends asking 'Do you consider yourself to be a trans person?' with answer options 'yes', 'no', and 'prefer not to say' (3). Gender Reassignment is a protected characteristic under equality legislation (4) and is included in SRUC's equality impact assessment toolkit. Recent case law has provided guidance on the inclusion of gender fluid and non-binary people under this protected characteristic (5).
Sexual orientation	1 Advance HE 2 EHRC Equality Act 2020 Code of practice employercode.pdf (equalityhumanrights.com) 3 Evidence and the Public Sector Equality Duty (EHRC) 4 Getting equalities monitoring right – Stonewall and Scottish Trans	Proposed answer options include 'queer' and 'asexual' however acknowledge that some terms are in the process of being reclaimed by young people but which may still be considered derogatory by some.(1). Stonewall and Scottish Trans recommend good practice questions (4). EHRC note that this can be perceived as a private issue and questions should be sensitive. (2). Stonewall and Scottish Trans guidance suggest asking people about how open they are about their identity (4). Guidance notes that some people may feel uncomfortable disclosing their sexual orientation initially, but that evidence shows disclosure increases where organisations create a culture of trust (3). In 2021, SRUC reported on the sexual orientation demographic of employees. Answer values are consistent with census and HESA.(5)

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	5 SRUC 2021 equality outcomes report 6. Equality Act 2010 7. Exploring the Q in LGBTQ: article. 8. Inclusive Employer blog	Sexual orientation is a protected characteristic under equality legislation (6) and is included in SRUC's equality impact assessment toolkit. In addition to gay, lesbian, and bisexual, other non–heterosexual identity labels are increasingly being used, including asexual, pansexual, and, the identity group that is the focus of this article, queer. Article explains the rising use of term 'queer' among LGBTQI+ community. (7). Conversely, the term 'queer' can be viewed as derogatory due to historical use (8).
Religion or Belief	1 Advance HE 2 EHRC Equality Act 2020 Code of practice employercode.pdf (equalityhumanrights.com) 3 Evidence and the Public Sector Equality Duty (EHRC) 4 SRUC 2021 equality outcomes report 5. Equality Act 2010	Recommend a question on religion or belief is included and acknowledges different approaches across the UK (1). EHRC notes the value in understanding employee needs under this equality group (2). The guidance notes that religion or belief can be a sensitive issue and data can be difficult to interpret with varying levels of commitment to a particular religion or belief (3). In 2021, SRUC reported on religion or philosophical belief and answer sets look similar to Census (likely 2011 answer options). (4). Religion or Belief is a protected characteristic under equality legislation (5) and is included in SRUC's equality impact assessment toolkit.
Pregnancy or maternity	1 Advance HE 2 Measuring Up? Report 7 (EHRC)	National data and research have highlighted how pregnancy, maternity and parental leave have an impact on people's careers. In addition, not enough is known about the number of students that start a course of study while pregnant or become pregnant during their studies or about their

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	3 SRUC 2021 equality outcomes report **4.** Equality Act 2010	experiences of pregnancy and maternity. Advance HE therefore recommends optional monitoring of data on pregnancy and maternity. Data will also ensure that the benefits, facilities and services for staff are adequate in meeting the needs of employees who are pregnant or have taken maternity leave (1). Pregnancy and maternity and gender reassignment are still the characteristics that are least often reported on in relation to employee composition (specifically recruitment, development and retention). Reporting rates for both have fallen when compared with 2015 (2). In 2021, SRUC were able to report on parental leave numbers including maternity leave and adoption leave (3). Pregnancy & maternity is a protected characteristic under equality legislation. (4) and is included in SRUC's equality impact assessment toolkit
Marriage or civil partnership	1 Technical Guidance (EHRC) **2** SRUC 2021 equality outcomes report 3. Equality Act 2010	Marriage and Civil Partnership is a protected characteristic under equality legislation, and is included in SRUC's equality impact assessment toolkit. A body subject to the duty only needs to comply with the first need of the duty and only in relation to work (Part 5 of the Act). This is because the parts of the Act covering services and public functions, premises, and education do not apply to that protected characteristic.(1, 3) In 2021, SRUC reporting on marriage and civil partnership with answer values similar to HESA but including 'single' and 'living together'. We also reported on this equality group in terms of progress through recruitment but did not aggregate data and some totals reported were in single figures (2).

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		Pregnancy & maternity is a protected characteristic under equality legislation. (4) and is included in SRUC's equality impact assessment toolkit
Carers	1 Advance HE 2 SRUC 2021 equality outcomes report	It is important that a question collects information about different types of caring responsibilities, reflects on the changing nature of these roles, acknowledges that respondents might have multiple caring responsibilities and that responsibilities might not occur on a regular or daily basis. Example question and answer set given here – Caring responsibilities	Advance HE (advance-he.ac.uk) (1). In 2021, SRUC report on parental leave numbers including maternity leave, paternity leave, shared parental leave, and adoption leave (2).
British Sign Language	1 BSL National Plan 2017-2023	Data on numbers of BSL users contribute to evidence/ progress towards to the aims of the BSL National Plan (1). (also see Disability)
Corporate Parenting/ care experienced	1 HE provider good practice briefing for care experienced students	Undergraduate, Postgraduate, Conservatoires, Teacher Training	UCAS 2 Children and Young People (Scotland) Act 2014 (legislation.gov.uk)	In 2022, we updated the supporting text for the question to clarify what we mean by 'care', mindful of the different 'definitions' of care experience considered by providers and across the UK (as explained above). This change was developed in collaboration with a broad range of expert and sector organisations around the UK to ensure it was inclusive and representative of these different experiences of care: Have you been in care? Yes/No. Select yes if you've ever lived in public care or as a looked-after child, including: 1 with foster carers under local authority care 2 in a residential children's home

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy, practice, process or service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		3 being 'looked after at home' under a supervision order 4 living with friends or relatives in kinship care Note: This doesn't refer to time spent in boarding schools, working in a care or healthcare setting, or if you're a carer yourself.(1). The Act and other guidance focuses on corporate parent services and support. (2) However, some universities and colleges consider care experience in terms of opportunities for staff (e.g. mentoring) or embed care experience in equality impact assessment toolkits.

Consultation and stakeholder involvement: Speaking to people who will be affected by your policy, practice, process or service can help clarify the impact it will have on different equality groups. Describe below what you learned from the consultation/ involvement. Consultation can take time so make sure that you build this into your policy, practice, process or service review/ development timeline.

Equality Diversity and Inclusion Committee (May 2023)
A paper and options for data gathering and about the development of a SRUC wide equality, diversity and inclusion policy was considered by the EDI Committee in May 2023 which includes SRUC Student Association, trade unions, and the Rainbow Staff Network. The outcome of that discussion and further engagement about using a pregnancy and maternity question was:
- Sexual Orientation: Committee agreed to include 'queer' as an additional answer value which can be aggregated under 'other' for the HESA return.
- Carer: after some discussion it was agreed to add in as an additional group.
- Committee agreed to ask 3 questions to gather data on Sex, gender identity and gender reassignment:
- Pregnancy and maternity: there was discussion about the requirement for the data and potential reliability of data. Further research was undertaken with other institutions and a wider poll undertaken with EDI Committee members which resulted in using the Advance HE question being the preferred option with the caveat that clear information on the reason for gathering and the use of the data is required.
- Agreement in principle to develop an SRUC-wide equality, diversity and inclusion policy

Senior Leadership Team (June/ July 2023)
No additional equality impact raised.

Trade Unions (July/ August 2023)
No additional equality impacts raised. There was a query about including as standard the additional groups under the EDI policy in the equality impact assessment process and monitoring, in addition to the protected characteristics, as standard.

Equality Diversity and Inclusion Committee (August 2023)
The policy and supporting equality impact assessment was approved in principal and with the following tweaks:
- Two changes in the disability section: include situational/ temporary disability, and to ensure we note mental health and non-visible disability.

Record here if you need to undertake a full equality impact assessment based on your evidence above.

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality		Proceed to sign off (step 5) to agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups	Y	**Proceed to Step 3: complete full EqIA**
It is unclear if there is relevance to some or all of the equality groups		Proceed to Step 3: complete full EqIA

5 **Impact on equality groups and changes to policy, practice, process or service**

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- **Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010?** How will this be mitigated?

- **Is there potential to advance equality of opportunity between people who share a characteristic and those who do not**? How can this be achieved?

- **Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not?** How can this be achieved?

Does the policy, practice, process or service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics? In the tables below, record the impact of the policy, practice, process or service, as it is planned or as it operates, might have on each equality characteristic and describe what changes in policy, practice, process or service or actions will be required to mitigate that impact or to take advantage of a positive impact.

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
Age	Potential for discrimination	x			Policy explicitly states age is a protected characteristic and is protected under the EDI Policy.

Date of birth will be used for employee data monitoring as data is held in other parts of the HR system and not gather through the data monitoring form.

For data collection in other situations e.g. surveys where it is to capture a 'moment in time' then age ranges should be used e.g. 16–19 years, 20–24 years, 25–29 years and so on to 65+ years. |
	Potential to advance equality of opportunity	x			
	Potential to foster good relations	x			
Disability	Potential for discrimination	X			Policy explicitly states disability is a protected characteristic and is protected under the EDI Policy. Explicit section on disability that sets high level approach to reasonable adjustments (specifics are dealt with under other policies). Explicit narrative added to both policy and data gathering guidance that disability includes mental ill health and non–visible disabilities, and that disability can be
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					transient/ be experienced at any stage in life.

Agreed by EDI Committee to gather data using HESA recommended question and answer values. Separate equality data monitoring guidance will ensure responders are aware that the example conditions in the answer options are just examples.

Agreed to collect data about British Sign Language to meet HESA requirements and our obligations under the BSL (Scotland) Act. |
| **Race** | Potential for discrimination | X | | | Policy explicitly states race is a protected characteristic and is protected under the EDI Policy.

HESA require specific nationality for returns therefore this will be a long list which is available to employees. |
| | Potential to advance equality of opportunity | X | | | |
| | Potential to foster good relations | X | | | |

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					Ethnic origin is required by HESA and we will use their format for Scotland.
Sex	Potential for discrimination	x			Policy explicitly states sex is a protected characteristic and is protected under the EDI Policy.

Agreed to ask a binary Sex question using the HESA question and Scotland Census approach and guidance with reference to legal documents for those who are unsure how to answer. We will include 'other' with guidance that this is only an option for those whose country recognises a third legal sex so as not to exclude some international colleagues. |
| | Potential to advance equality of opportunity | x | | | |
| | Potential to foster good relations | x | | | |
| **Gender Reassignment** | Potential for discrimination | x | | | Policy explicitly states gender reassignment is a protected characteristic and is protected under the EDI Policy. The term 'gender identity' has been added next to gender reassignment to reflect inclusion of people of various gender identities as per recent case law.

There is a HESA requirement. Equality monitoring will include example questions |
| | Potential to advance equality of opportunity | x | | | |
| | Potential to foster good relations | x | | | |

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					to include both trans status and gender identity.
Sexual orientation	Potential for discrimination	X			Policy explicitly states sexual orientation is a protected characteristic and is protected under the EDI Policy. Despite evidence that some people can find the term derogatory, it is agreed to add 'queer' as additional equality data monitoring answer option to the HESA format to offer a non–binary response and in response to evidence that the term is starting to be reclaimed.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
Religion or Belief	Potential for discrimination	X			Policy explicitly states religion or belief is a protected characteristic and is protected under the EDI Policy. Agreed to use HESA format.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
Pregnancy or maternity	Potential for discrimination	X			Policy explicitly states pregnancy and maternity is a protected characteristic and is protected under the EDI Policy.

Any data gathered (for example via recruitment) will not be held in the HR system because we monitor instances of family leave in other ways. |
| | Potential to advance equality of opportunity | X | | | |
| | Potential to foster good relations | X | | | |

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					Agreed to include Advance HE question on pregnancy in the equality data guidance to be used where this is relevant and proportionate (guidance will be provided alongside other protected characteristics). Explicit wording in data gathering guidance advising of the sensitivity of questions and for SRUC to carefully consider when it is appropriate to gather this data.
Marriage or civil partnership (in employment only)	Potential for discrimination	x			Policy explicitly states marriage and civil partnership is a protected characteristic and is protected under the EDI Policy.

Although not required by HESA, data for this group will be gathered and included in relevant guidance Scotland Census will be used and marriage and civil partnership will be aggregated. |
	Potential to advance equality of opportunity	n/a	n/a	n/a	
	Potential to foster good relations	n/a	n/a	n/a	
Corporate parenting/ Care experienced	n/a	n/a	n/a	n/a	Explicitly included in EDI Policy due to corporate parenting duties and commitments to wider inclusion.

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					EDI Committee to consider if this data would be useful for recruitment and/ or people policy development.
Caring responsibilities	n/a	n/a	n/a	n/a	Agreed to gather this data using Advance HE question and answer set to support understanding of family friendly policies and impact.

Think about and describe below how your assessment impacts on your policy, practice, process or service review or development timeline including but not limited to:
- Procurement criteria: do you need to include specific equality criteria as part of the technical specification?
- Communication plan/ products: do you need to communicate with people affected by this policy, practice, process or service in a specific format (e.g. audio, subtitled video, different languages)?
- Cost: do you propose any actions because of this assessment which will incur additional cost?
- Resources: do the actions you propose require additional or specialist resource to deliver them?

Record the outcome of this assessment below having considered the potential or actual impacts of your policy, practice, process or service on equality groups. Choose from one of the following (mark with an X or delete as appropriate):

Note: You must take action to remove barriers or take advantage of positive opportunities BEFORE the policy, practice, process or service goes live.

Please select (X)	Implications for the policy, practice, process or service
	No major change: Your assessment demonstrates that the policy, practice, process or service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.
X	**Adjust the policy, practice, process or service:** You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy, practice, process or service when implemented.
	Continue the policy, practice, process or service: The policy, practice, process or service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.
	Stop and remove the policy, practice, process or service: The policy, practice, process or service will not be implemented due to adverse effects that are not justified and cannot be mitigated.

6 Monitoring the policy, practice, process or service impact and further actions

It is important to continue to monitor the impact of your policy, practice, process or service on equality groups to ensure that your actual or likely impacts are those you recorded. Your monitoring information will also inform a future review of the policy, practice, process or service.

Record in the table below how you intend to monitor the impact of this policy, practice, process or service on equality groups. In the table below you should:

Measure	Lead department/ individual	Reporting (where/ frequency)
Quality of equality data by relevant stakeholder groups	Human Resources (employees) Registry (Students)	Annually.
Quality of EqIAs and timely completion/ publication	Monitored by EDI Lead	EDI Committee – quarterly reports.
Complaints about our approach from employees, applicants, students or general public	EDI Lead via Human Resources, SRUC complaints	Reactively to EDI Committee.
Performance against the PSED and Scottish Specific Duties as evidence through progress reporting	SRUC progress is monitored by the EDI Lead	EDI Committee (quarterly updates) ELT/ Board (external reports every two years).

Record further actions or changes required after the policy, practice, process or service is implemented in the table below. Make it clear if there are no outstanding actions.

Action	Lead department/ individual	Action target date
Development of an easy read version of the policy	EDI Lead	October 2023
Develop an awareness campaign about the revised questions and answers values and how SRUC holds and uses this information.	Human Resources/ EDI Lead	October 2023 (or in line with implementation on new format).

7 Sign off and future review

Equality impact assessments must be signed off by the relevant Head of Service/ Department, even where an EqIA is not required. Also note here when you plan to review the policy, practice, process or service and accompanying EqIA which should be no later than 5 years from policy, practice, process or service implementation.

a. Senior Responsible Owner/ Committee sign off.
Job/ Committee title: Equality, Diversity and Inclusion Committee
Date: 23/08/2023

b. Equality impact assessment review date.
Date: 31/07/2028

Important: You must send the final version of this equality impact assessment to:

- **the Equality Diversity & Inclusion Lead.**
- **the Communications team for publication on SRUC's equality page on the external website.**

Document control	
Document control:	V1.0

Date policy, practice, process or service live from:	28/08/2023	
Review/ Approval Group:	EDI Committee	
Last reviewed:	Date	
Review cycle:	5 years – July 2028	
Document change log		
Version/ Author	Date	Comment
V0.3	29/06/2023	EqIA broadened out to wider EDI Policy
V0.4	16/08/2023	EqIA and policy reviewed by SLT and Trade Unions
V1.0	23/08/23	Signed off by EDI Committee