

GSA SUMMARY REPORT OF EQUALITY CONSIDERATION AND ASSESSMENT OF EQUALITY IMPACT

Date of Assessment:	June 2020	
School of Executive Group Area:	Registrar and Secretary	
Department:	Governance	
Lead member of staff: Email:	Edna Docherty H.Docherty@gsa.ac.uk	
Area of decision making/title of policy, procedure, programme or relevant practice:	Register of Interests Policy and Procedure	
Please indicate if this is:	<p>New:</p> <p>Existing/Reviewed:</p>	<p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p>

1. Summary of how equality, diversity and participation have been considered and due regard given to the Public Sector Equality Duty (PSED):

As set out in GSA's Statement of Corporate Governance, GSA maintains and publicly discloses a current Register of Interests of its Board of Governors and executive officers.

GSA is committed to conducting its business fairly, honestly and openly. This is in alignment with the *Nine Principles of Public Life in Scotland* and the compilation and maintenance of a comprehensive Register of Interests is central to GSA's approach to encouraging openness from its Board and relevant executive officers. This also emphasises GSA's expectation that those connected with its Board of Governors, will conduct themselves in accordance with high standards of integrity and honesty.

The purpose of the Register of Interests is to provide information to the Board of Governors and to the public about the business interests of all Governors and relevant members of the School's executive, i.e. the Director of Finance, the Secretary to the Board and any other executive officers closely involved with the work of the Board, which might influence their judgement, decision making and actions, or which might be reasonably perceived by a member of the public as doing so (or having the potential to do so).

The Register of Interests Policy and Procedures is specific to a business perspective, however, it does also provide a mechanism for Governors to disclose any other private, professional, financial, familial or material interest which may be perceived as being likely to influence their judgement, and where there is uncertainty about this, Governors are encouraged to err on the side of caution and seek advice from the Secretary.

In conjunction with activity undertaken in 2017/18 and 2018/19 to ensure GSA's compliance with the Code of Good Higher Education (2017), specifically DP 30¹, a review of GSA's existing Register of Interest was undertaken. This was to ascertain whether GSA's approach to this important activity was in line with the expectations of the Code. The nature of this Policy requires that it applies equally and fairly to all members of the Board of Governors and relevant executive officers and the PSED was considered as an integral aspect of the policy review process, specifically in relation to its impact on the three Equality Duties, as outlined in section 3 below.

2. Evidence used to make your assessment:

- Desk-based research undertaken with regard to best practice in the sector, focussing on post 1992 Scottish HEIs.
- Review of GSA's published *Register of Interests* from 2011/12 – 2017/18 and into the process by which the information is sought from Governors and relevant Senior Officers.

3. Outline any positive or negative impacts you have identified:

This Register of Interests Policy and Procedure is based on the Nine Principles of Public Life in Scotland and therefore encourages openness and emphasises the need for the highest standards of honesty and impartiality for members of the Board of Governors. It will be used to identify any circumstances where a Board member's external interests, business, private, professional, financial, familial or material, which are likely to be or would, if publicly known, be perceived as being likely to influence the exercise of independent judgement.

The potential impact in respect of the three duties of the Equality Act 2010 has been identified as follows:

1. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act:

The policy is likely to have a positive impact on this duty as it is based on the principles of fairness. It is designed to identify any conflicts of interest in a fair and consistent manner, regardless of the beliefs, needs or other characteristics of the individuals involved. Where an individual's specific circumstances are relevant to the matter being addressed, there is an obligation for discussion between the individual Governor and the Secretary to the Board which will provide opportunity for such circumstances to be discussed and taken into account.

Although the policy covers interests specifically from a business perspective relevant, or potentially relevant, to an individual's role as a Governor or as an executive officer, it also provides a route for Governors to disclose other private, professional, financial, familial or material interests which could be regarded as potentially prejudicial to the open, objective and impartial discharge of the individual's role as Governor. Where there is uncertainty about this, Governors are encouraged to err on the side of caution and seek advice from the Secretary.

Individuals shall be invited to review and revise the information contained about them in the Register at least once every year.

¹ *The Institution is expected to publish the register of interests on its website, suitably redacted to take account of data protection duties, and keep it up to date. The Secretary and any other senior officer closely associated with the work of the governing body, for example the Finance Director, must also submit details of any interests to be included in the register.*

The policy also signposts members of the Board to other relevant policies, e.g. Gifts & Hospitality Policy for the Board of Governors and Anti-Bribery and Corruption Policy.

2. Advance Equality of Opportunity between people who share a protected characteristic and people who do not share it:

The Policy should not have any impact (positive or negative) on the need to advance equality of opportunity between people who share a protected characteristic and people who do not share it. All persons who are required to declare interests or conflicts of interests do so from a business perspective irrespective of their beliefs, needs or other characteristics.

3. Foster Good Relations between people who share a protected characteristic and people who do not share it.

The Policy should not have any impact (positive or negative) on the need to foster good relations between people who share a protected characteristic and people who do not share it. All persons who are required to declare interests or conflicts of interests do so from a business perspective irrespective of their beliefs, needs or other characteristics.

Ultimately this policy should assist GSA in the promotion of equality through best governance practice underpinned by integrity and respect.

4. Actions you have taken or planned as a result of your findings:

Action	Equality Impact	Person Responsible	Timeframe
Monitoring and Reporting			
1 Interests to continue to be declared at the beginning of each Board and Board Committee Meeting.	PSED (1)	Assistant Secretary to the Board (and Committee Secretaries)	On-going obligation
2 Individuals shall continue to be invited to review and revise the information contained about them in the Register at least once every year.	PSED (1)	Assistant Secretary to the Board (Corporate Governance Office)	On-going obligation
3 The Register of Interests, published on the GSA website, will be updated as changes occur.	PSED (1)	Assistant Secretary to the Board (Corporate Governance Office)	On-going obligation
4 Monitor the Register of Interests for matters arising with potential for equality impact to inform next policy review/development.	PSED (1,2)	Assistant Secretary to the Board	On-going to 2023

5. Where/when will progress and the outcomes of your actions be reported and reviewed:

The Registrar and Secretary will confirm actions 2 and 3 have been completed on an annual basis in his Registrar and Secretary's Report to the Board.

6. How will your actions and intended outcomes contribute to the delivery of GSA's equality outcomes:

The implementation of appropriate monitoring and reporting will provide data on the organisational culture of GSA and where relevant will be available to inform the delivery of the PSED and GSA's Equality Outcomes, specifically **Equality Outcome 1**: "An organisational culture in which respect for self and others is understood and practiced, and where identity-based ignorance or prejudice is challenged and confidence promoted."

The outcome of your assessment:

No action (no potential for negative or positive impact)

Action to remove barriers/mitigate negative impact

Action to promote positive impact

Sign-off, authorisation and publishing:

Review Lead

Signed	Edna Docherty
Position	Senior Policy Officer
Date	June 2020

Executive Lead

Signed	Craig Williamson
Position	Registrar and Secretary
Date	19 August 2020

Equality Lead (Head of Student Support and Development)

Signed	Julie Grant
Position	Head of Student Support and Development
Date	09/10/2020