

## EQUALITY IMPACT ASSESSMENT (EQIA) FORM

### A. General information

<b>Name of proposal</b>	SSSC corporate website ( <a href="http://www.sssc.uk.com">www.sssc.uk.com</a> )
<b>Responsible department</b>	Communications and Policy

### B. Aims of the proposal

<b>What do you hope to achieve?</b>	Publish and maintain the SSSC website which is accessible and inclusive and meets Web Content Accessibility Guidelines (WCAG) 2.1 standards.
<b>Why is the proposal needed?</b>	So that information about our role and processes is available for registrants, employers, stakeholders, the public and anyone who needs it. We also need the website to meet our statutory duties as a public sector body to publish and report information and meet the Public Sector Equality Duty.
<b>How will the proposal contribute to our strategic objectives and/or priorities?</b>	<p>The website contributes to all four strategic outcomes of the SSSC Strategic Plan 2023-2026 as it's where we publish all the information about our work.</p> <ul style="list-style-type: none"> <li>• People who use services are protected by a regulated workforce that is fit to practise.</li> <li>• Our work supports the workforce to deliver high standards of professional practice.</li> <li>• Our work enhances the confidence, competence and wellbeing of the workforce.</li> <li>• The social work, social care and children and young people workforce is valued for the difference it makes to people's lives.</li> </ul>
<b>How will the proposal address our equality duties?</b>	<p>The website complies with the public sector accessibility guidelines which means all users have the same access and it will help us meet our Public Sector Equality Duty to:</p> <ul style="list-style-type: none"> <li>• eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010</li> </ul>

	<ul style="list-style-type: none"> <li>• advance equality of opportunity between people who share a relevant protected characteristic and those who do not, by making sure our website is accessible and inclusive</li> <li>• foster good relations between people who share a protected characteristic and those who do not, by making sure everyone has the same access.</li> </ul>
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### **C. Data and evidence gathering**

<b>What evidence have you used to come to the decisions contained in this EIA?</b>	<p>Scottish Social Service Sector: Report on 2022 Workforce Data</p> <p>Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 guidance</p> <p>User Research Report for the SSSC December 2023 (Vidatec, internal report)</p> <p>Adults' Media Use and Attitudes report 2023 (Ofcom, 2023)</p>
<b>Have you engaged and consulted on the proposal?</b>	<p>We carried out research on the usability and accessibility of the website, including an options appraisal for future redevelopment, from November 2023 to January 2024.</p> <p>The research found:</p> <ul style="list-style-type: none"> <li>• website failed on 16/50 accessibility criteria</li> <li>• the site does not present information in an effective and understandable manner</li> <li>• the navigation is overly complex and strenuous</li> <li>• the site is not mobile friendly, despite mobile being the preferred device used to access the site</li> <li>• current implementation of Dynamics 365 has limitations which are negatively impacting the user experience of the site.</li> </ul> <p>Key recommendations from the research are:</p> <ul style="list-style-type: none"> <li>• work towards attaining compliance with WCAG 2.1 AA</li> <li>• improve the way content is written and managed by improving the internal review process</li> </ul>

	<ul style="list-style-type: none"> <li>• look at ways to improve the user journeys by simplifying navigation</li> <li>• apply a mobile-first mentality to address responsive issues</li> <li>• consider moving away from D365 if the current implementation cannot be amended to meet the other key recommendations.</li> </ul>
<b>Have you used best judgement in place of data/research/evidence?</b>	No.
<b>Have you found any gaps in the data?</b>	We must have an accessible and inclusive website that reflects the wide and varied nature of the social work, social care and children and young people workforce we regulate. We have limited information on those with protected characteristics from our social service workforce data reports, particularly ethnicity and disability as there is a large proportion reported as unknown in the data returns. We are developing an improved understanding of registrants by asking them to complete equality data and plan to publish an updated picture in due course.

#### **D. Assessing impact and identifying opportunities to promote equality**

Gender – 83% of the social service workforce is female and 47% of the workforce work part time (Scottish Social Service Sector: Report on 2022 Workforce Data). Our website is freely available at all times so access is not affected by working patterns and caring responsibilities, which predominantly fall to women. This means it should have a neutral impact.

Ethnicity – we don't hold complete ethnicity data for our registrants, as it's optional to provide this information. It is also under reported in the workforce data reports. The latest data report shows that 4% of the total workforce is from an ethnic minority, but this varies from 1% in the public sector to 6% in the private sector.

We have identified the potential that the way we present information on our website may be a barrier for individuals who do not speak English as a first language. This may disproportionately affect workers from minority ethnic backgrounds. To mitigate this impact we are committed to using plain language in our website content. We also translate the SSSC Codes of Practice into alternative languages on request. Because of these mitigations, we believe our website will have a neutral impact on this protected characteristic.

Disability – there is a large number of unknowns regarding disability in our workforce data reports but the latest one shows it ranges across sub-sectors from 0%-7%. We have a statutory duty to meet the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, however our current website is only partially compliant due to constraints of the D365 platform and website budget. We continually review the content and make improvements to accessibility in partnership with our website development company when we can. Some things are constraints arising from the website platform itself, which would require universal changes to the software by Microsoft. There are 15 accessibility standards that the website fails and which

we cannot resolve. We acknowledge these in our accessibility statement as required by the regulations. We've assessed that resolving these issues is a disproportionate burden in terms of the regulations due to the costs and our intention to redevelop the website during 2024/25. We've recently completed a research and scoping project to inform the planned redevelopment our website during 2024/25 to make sure we meet our obligations under the accessibility regulations. We have accessibility guidance for staff to help them make sure any publications or resources they produce meet the required accessibility standard and all our content should follow our Brand Guide and be written in plain language. There is a negative impact on this protected characteristic.

Sexual orientation – our website will have a neutral impact on this protected characteristic.

Gender reassignment – our website will have a neutral impact on this protected characteristic.

Age – the median age of the social service workforce is 43, which is older than the general working population median age (41). The SSSC provides lots of support to improve the digital capabilities of the workforce, which can help improve confidence in using technology. We are committed to using plain language, free from jargon where possible, to improve understanding of our website content. The overuse of jargon or sector specific language may act as a barrier to understanding because of age, for example, for young workers who are new to the workforce and potentially less familiar with terms used in the sector. There is a neutral impact on this protected characteristic.

Marital and civil partnership – our website will have a neutral impact on this protected characteristic.

Pregnancy and maternity – our website will have a neutral impact on this protected characteristic.

Religion/belief/non-belief – our website will have a neutral impact on this protected characteristic.

## **E. Challenges and opportunities for groups living in an island community**

This section considers the impact or effect of the proposal on island communities and whether this could be significantly different from its effect on other communities.

The website is freely available all over the world and users can access it in their own time, so there's a positive impact for island communities as they can access the same as users on the mainland. An ICIA is not required.

## **F. Child rights and wellbeing**

This section considers the impact of the proposal on children and young people, or specific groups of children and young people, in Scotland.

Our website is not aimed at children but having information about registration, regulation and workforce development freely available to the workforce (registered and unregistered), employers and the public supports high standards of care and fosters a positive impact on the areas listed. We are also working to make sure our resources and publications are accessible as possible, for example producing an easy read Codes of Practice and a child and young people resource to support understanding of the Codes of Practice.

We are committed to using plain language, free from jargon where possible, to make sure everyone who needs to access our website content can understand it, regardless of their age. We recognise we have more to do in terms of plain language and readability and will address this as part of our website redevelopment during 2024/25.

Supporting workforce development and high standards of care helps address article 27 which requires that every child has the right to a standard of living adequate for their mental, spiritual, moral and social development and article 27 (3), which requires states to help parents meet this right.

## **G. Health and wellbeing and health inequalities**

This section considers the impact of the proposal on physical and mental health and wellbeing. This includes for example, participation, creativity and developing potential.

Providing information to support registration and workforce development on our website has a positive impact on health and wellbeing of workers, as it enables them to improve their knowledge, skills and confidence to undertake their role and meet the behaviours and values in the SSSC Codes of Practice. Enabling them to maintain their registration and support their continuous professional learning (CPL) will help them be more able to stay in employment, progress to other roles and improve family income and health and wellbeing. Being better able to deliver high quality care services brings similar benefits for the people receiving those services too.

## H. Economic and social sustainability

This section is concerned with the impact of the proposal on pay and employment opportunities as well as valuing and supporting voluntary work.

Supporting registrants to maintain registration and complete their CPL by providing our website helps workers have the knowledge, skills and confidence to deliver high quality person-centred services, which promote equality and opportunity for all and contribute to overall community wellbeing and sustainability.

Ofcom's Adults' Media Use and Attitudes report 2023 (Ofcom, 2023) shows 27% of DE households (semi-skilled and unskilled manual occupations; unemployed and lowest grade occupations) only access the internet using smartphones. The website is not mobile friendly so there could be a disproportionate impact on lower income households. This is a negative impact.

## I. Care experienced children, young people and adults

This section concerns our duties to put Scotland's care experienced children, young people and adults at the heart of what we do.

Supporting registrants to maintain registration and complete their CPL by providing our website helps workers have the knowledge, skills and confidence to deliver high quality person-centred services, which impacts positively on care experienced children, young people and adults. This will have a positive impact on our duties as a corporate parent by improving care for care experienced children, young people and adults receiving services.

## J. Decision making

Which of the following statements best describes the action that you should take following the EqIA for your proposal?

<b>No major change</b>	<input type="checkbox"/>
<b>Adjust the policy</b>	<input checked="" type="checkbox"/>
<b>Continue with policy</b>	<input type="checkbox"/>
<b>Stop and remove the policy</b>	<input type="checkbox"/>

Outline the reasons why you have selected this option.

There is evidence that our website will have negative impacts for those with disabilities and lower income households. We plan to redevelop the website during 2024/25 to address these negative impacts to make sure we meet the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

## K. Monitoring and reviewing

How will you monitor the implementation of the policy/proposal? How and when will you review the impact of the proposal? Outline the actions that you will take, the timescale for these and who will be responsible for carrying out these actions.

Action	Timescale	Person Responsible
We regularly report on the website using Google Analytics to see how users navigate the website, what's popular and any barriers they come across. We also have a feedback survey and web form so people can report any issues.	Monthly web usage reporting and ongoing monitoring and response/ actions as appropriate from feedback survey and web form.	Communications Manager
We have recently completed a research and scoping project to inform the planned redevelopment our website during 2024/25 to make sure we meet the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.	We are due to make recommendations for the website redevelopment to the SSSC Digital Programme Board in February 2024. Redevelopment of the website is subject to funding being available in 2024/25.	Communications Manager

## L. Sign off

**Name:** Nicola Gilray

**Title:** Head of Communications and Policy

**Date approved:** 22/1/2024