Equality Impact Assessment
Validation Decision Notice

<table>
<thead>
<tr>
<th>EIA Reference Number</th>
<th>171 – Sickness Absence Policy and Procedure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service, policy, or strategy</td>
<td>Sickness Absence Policy and Procedure</td>
</tr>
<tr>
<td>Element(s) assessed</td>
<td>All</td>
</tr>
<tr>
<td>Names of Assessors</td>
<td>HR Business Partner, Local Tax Court Officer, Customer Access Manager, Policy Officer</td>
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Consider:

- Was discrimination or disadvantage identified? [Yes, No] Yes
- Was the service promoting equality? [Yes, No] Yes
- Could the service be improved in promoting equality? [Yes, No] No
- Are the customers' needs understood and met? [Yes, No] No
- Is there good evidence and/or reasoning to support the decisions on whether groups are/aren't affected? [Yes, No] Yes
- Does the summary report properly reflect the key findings of the assessment? [Yes, No] Yes
- Is the summary report clear and easy to understand? [Yes, No] No
- If improvements have been identified, do they reflect and deal with the key findings? [Yes, No] No

The decision is to: Validate [✓] Not validate [ ]

The reason/s for the decision are: Please give details below

Validation given – information correct [✓]
Not validated – decision not to proceed as EIA incorrect [ ]
Not validated - screening error [ ]
Not validated – research/consultation error [ ]
Not validated – improvement error [ ]

Signed
Karen Brimacombe

Designation
Corporate Director

Date
2 August 2012
Equality Impact Assessment

Stage 1

<table>
<thead>
<tr>
<th>STAGE 1 – Briefing Note</th>
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<tr>
<td><strong>EIA ID (Sinbad reference number)</strong></td>
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<td><strong>Date of meetings</strong></td>
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<td><strong>Job Titles of assessors</strong></td>
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The Assessment

The revised Sickness Absence policy and procedure was reviewed by the assessors to assess whether the policy could have a differential impact on members of staff from different equalities groups.

Assessment Findings

The general agreement was that the policy and procedure serve as a useful and necessary guide and tool for staff and Managers, however, with regards to equalities/protected characteristics groups, specific points were raised including: the positive reference in the policy to making reasonable adjustments for individuals with disabilities and the use of plain English to enhance understanding of the policy, the fact that the policy could note that absences relating to the disability/long-term illness or pregnancy status of an employee are identified separately in absence records, a statement about offering alternative formats would be useful in some instances for individuals with English as a second language or with learning disabilities.

It was also noted that the policy outlines the procedure in detail and refers to the Equal Opportunities Policy. There is a need for evidence about sickness absence for protected characteristics and general staff profile to show which groups are more likely to have time off due to sickness and to decide which provisions need to be made.

Justification

A decision to proceed with a scoping/screening was made in line with the policy having relevance to/impact on people and the results of the discussion above.
Stage 6

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<th>171 – Sickness Absence Policy and Procedure</th>
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<tr>
<td>Date of assessment</td>
<td>27 February and 10 July 2012</td>
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<tr>
<td>Job title of assessors</td>
<td>HR Business Partner, Local Tax Court Officer, Customer Access Manager, Policy Officer</td>
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The Assessment

The revised Sickness Absence policy and procedure was considered by the assessors.

Prior to the EIA, a key document which was referred to whilst revising the policy was the ACAS Code of Conduct and Guidance which set out good practice and principles for fair grievance procedures.

The panel assessed the impact of the policy and procedure on all of the groups listed in the screening exercise and identified areas of positive and negative differential impact on groups. These were recorded and possible action points were discussed to overcome any issues and detailed in Stage 5.

The Customer/Customer Group

An action point has been noted to identify staff equalities data in relation to sickness absence to further inform this process.

Consultation and Research

N/A at this stage.

Key Individuals and Organisations

HR Business Partner, Local Tax Court Officer, Customer Access Manager.

Assessment Findings

It was recognised that the inclusion of a flow chart which summarises the policy may assist with understanding.

With regards to individuals with disabilities, the policy allows flexibility and reasonable adjustments to be made for individuals with a disability, based on the Equality Act 2010. It is also written in plain English to improve understanding of the contents. Employees can be accompanied at all stages of the procedure (informal and formal conversations). Possible improvements, included highlighting the fact that disability/long-term sickness and pregnancy-related absence is recorded separately from general sickness absence and linking the policy to the transgender policy. It was also discussed that HR/Managers should take into account the responsibilities of carers to their dependents.

In relation to section 12 of the policy – Cosmetic surgery, it was commented that there may be cases where it is difficult to draw a distinction between whether the surgery was cosmetic or not, for example if the surgery is related to confidence issues, mental health issues or gender reassignment. Similarly,
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The example of gastric band surgery was discussed as this could be for medical reasons and may also help reduce sickness absence in the future. It is appreciated that such cases need to be considered on their individual circumstances and if managers are unsure they are welcome to approach their HR Business Partner for discussion and guidance.

There was discussion around how individuals may be supported and that part of the role of HR within the process is to assist with identifying any adjustments, for example someone with language difficulties may be given support and/or extra time with documents or any accessibility issues would be taken into account when finding a location for a hearing. There was also an agreement that there needs to be a corporate approach to policy templates to include an accessible format statement (see recommendation below).

Recommendations

The recommendations and action points agreed from this EIA include:

- Ensure HR/Managers are made aware of the revised policy and procedure to ensure consistent advice is given and support is offered to managers in implementing the Policy and Procedure where necessary.
- Place the revised policy and procedure on the intranet and advertise it on Sinbad and to promote to Environmental Care Operations staff through the Environmental Care newsletter. Managers to cascade the procedure to their teams at team meetings.
- Include a flow chart which summarises the policy may assist with understanding.
- Need to gather more evidence about sickness absence for protected characteristics and general staff profile to show which groups are more likely to have time off due to sickness and to decide which provisions need to be made.
- There could be a link made to the transgender policy to clarify that leave taken for gender reassignment surgery is not recorded as sickness absence to avoid any unnecessary confusion.
- The policy could include the statement: ‘Where necessary, information can be made available in different formats to enhance full understanding of the policy or for those who are involved in recorded discussions/when formal action needs to take place, to avoid possible discrimination’.
- The policy could also note that absences relating to the disability or long-term illness or pregnancy status of an employee are identified separately in absence records.