

**Equality Impact Assessment (EIA) Recording Form**

Please refer to the notes and examples in the EIA Guidelines to help complete this record.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Title of Activity/Proposal/Policy/Practice | Attendance Support Procedure | EIA Team and Lead Member of Staff (names of all people involved in this EIA) | Sue Clyne (Director of HR & OD)Fumie Nakamura (Projects and Systems Assistant) | Date | November 2024 |
| Type of Policy/Practice/ (tick box) | New  |  |
| Existing |  |
| Revised | X |

**Step 1 – Plan your process**

Considering the aims of the policy/proposal and the people will be involved.

|  |  |
| --- | --- |
| What are the aims and purposes of the activity/ decision/ new or revised policy or procedure?See Note 1 | The aim of updating the existing Edinburgh College Attendance Support Procedure is to ensure it complies with current employment legislation, uses up to date terminology and provides a transparent, supportive framework, which supports employees’ attendance and wellbeing at work. |
| Who will be affected? See Note 2 | All employees and managers will benefit from a consistent, supportive approach being taken across the College to managing employee’s attendance at work. |
| Who will be consulted?See Note 3 | Both EIS-FELA & Unison were consulted on the Attendance Support Procedure. This is not a new procedure but one which has been embedded and utilised across the College for some time but required recent updating to comply with legislative changes. |

**Step 2 – Consider the Evidence**

What are the evidence we need and how we can gather them?

|  |  |
| --- | --- |
| What evidence is available of how the policy/decision, etc. affects, or may affect, protected groups?Evidence could be quantitative, qualitative or anecdotal.Do we have enough evidence to judge what the impact may be?See note 4 | HR report in the Quarterly and Annual HR Dashboard for monitoring sickness absences. HR also report Quarterly and Annual Dashboards on the outcomes of long/short term absence cases. HR analyse the data and can identify quarterly or annual variations in the data of those cases and the types of outcomes being reached and can analyse 5-year trends etc where there is sufficient data. Additionally, the number of OH referral cases and the number of access to MCL Medics may help to identify the background to issues and options for resolution. HR Partner team regularly review and feedback on long/short term absence cases within their business areas so as to ensure consistency of practice across the College, bearing in mind the individual operational requirements of different departments/teams.In line with the Equality Act 2010, College considers requests for and, in appropriate circumstances suggest, reasonable adjustments to an employee’s (or potential employee i.e. successful job applicant) role or working environment where the individual has a recognised disability so going forward, monitoring the number of those reasonable adjustments could help to improve employee’s attendance at work.Ongoing review and discussion with both EIS-FELA and Unison on the implementation of the updated procedure may provide evidence going forward, where feedback has been received on the management of Attendance Support Procedure.Ensure updated procedure is available on the intranet and circulated to all employees and managers. |

**Step 3 – Assessing the impact**

This involves:

* Considering relevant evidence relating to people who share a protected characteristic
* Assessing the impact of applying a decision of a new or revised policy or practice against the needs of the Public Sector Equality Duty (PSED) and each protected characteristic.

How will the policy / decision help the College to comply with the Public Sector Equality Duty?

|  |  |  |
| --- | --- | --- |
| **Eliminating discrimination, harassment, and victimisation** | **Advancing equality-*** **Removing disadvantage**
* **Meeting different needs**
* **Encouraging participation**
 | **Fostering good relations*** **Tackling prejudice**
* **Promoting understanding**
 |
| Provides a consistent, supportive and transparent framework to support ALL employees when they have an attendance issue.A detailed process map for each absence category is provided to managers in the Manager Portal. Additionally, the Family-Friendly Policy and Procedure, the Flexible Working Policy and Procedure, and Occupational Health Referral Guidance are in place. | This Procedure means that whenever an employee has an attendance issue they are supported in the same way within the framework provided.Additionally, this Procedure ensures that reasonable adjustments are undertaken to enable an employee who has a recognised disability to remain at work or return to work from sickness absence. This also applies to job applicants for them to undertake the role offered. | This Procedure is well publicised to all employees and outlines the process available to support employees who have an attendance issue.The detailed key definitions and clear procedures for each absence category help to understand the processes for all employees and managers. Furthermore, the College provides managers regular training and guidance to support the application of this procedure and to motivate employees to achieve high levels of attendance.The informal resolution approach removes the potential attendance issues having to be addressed / supported using a formal procedure which has been designed to deal with different issues. This is much more supportive for the employee and clearer, more transparent for both the manager and employee to work through/follow. This should enable a more consistent approach being taken across the College. |

See Note 5

Key Questions to ask:

1. What potential positive/neutral/negative impacts can be identified?
2. What does evidence demonstrate about positive/neutral/negative impacts for different protected characteristic groups? E.g. statistics on participation, progression or outcomes, feedback or complaints
3. Does the policy/procedure/practice/decision take account of the needs of people with different protected characteristics? How is this demonstrated?
4. Does it affect some groups differently? Is this proportionate?

See Note 6

| Protected characteristic | PotentialPositive Impact Y/N | Details of Expected Positive Impact | Potential Negative Impact Y/N | Details of Expected Negative Impact |
| --- | --- | --- | --- | --- |
| Age | Yes | The College will provide managers with regular training and guidance to support the application of this procedure and to motivate employees to achieve high levels of attendanceA national Menopause Policy and Manager Guidance is in place. Additionally, the College provides ‘Menopause Awareness and Attendance Support training to all managers.The use of clear trigger levels in managing absence negates the risks of menopausal women and older employees being subject to formal procedures. Absence directly related to pregnancy, maternity or disability is not counted towards trigger levels. | Yes | There is a misconception that older workers are likely to be less healthy than their younger colleagues. This may lead to more older employees potentially being put through formal processes.Menopause is not recognised as disability under current legislation so women of menopause age may be put through formal processes more.  |
| Disability | Yes | The Procedure ensures that any reasonable adjustments required by employees who have a recognised disability must be considered and be undertaken to enable to remain at work.Absence directly related to pregnancy, maternity or disability is not counted towards trigger levels.  | Yes | Some employees with disabilities may have ‘reasonable adjustments’ in place and may feel they are viewed as being less healthy at undertaking their role than others because of their need for reasonable adjustment(s). |
| Gender reassignment | Yes | The informal resolution approach of this Procedure should enable employees to clearly outline any short-term implications on their absence from the transition process. | Yes | Transitioning employees may find their health / performance temporarily affected due to the impact/side effects, if there are any, related of the transition process.  |
| Marriage/civil partnership (relevant in employment law) | Yes | This procedure applies to all employees fairly regardless of whether they are in marriage or civil partnership. | No | No negative impact has been identified. |
| Pregnancy and Maternity | Yes | The informal resolution approach of this Procedure should enable employees to clearly outline any short-term implications on their overall attendance from being on maternity leave for up to a year or longer if also taken accrued leave.Absence directly related to pregnancy, maternity or disability is not counted towards trigger levels. | Yes | Employees returning from maternity leave after 1 year (or longer if they have also taken accrued annual leave) are likely to find it takes them time to manage their time between work and family life, that may lead to attendance issues and formal processes. |
| Race | Yes | BAME employees may have faced additional challenges in their lives, such as racial harassment or discrimination, with subsequent possible negative effects on their mental wellbeing – provision of a consistent and supportive framework is likely to be a positive support for BAME employees, e.g. providing Employee Assistant programme. Any health condition that impacts disproportionally on people from a particular ethnic minority will be taken into account. | Yes | BAME employees may be adversely affected by some health conditions.  |
| Religion or belief | Yes | The College will ensure that all employees will be able to access support regardless of their religion or belief. | Yes | Similar to race, some employees may be reluctant to seek help because of their religion or belief. |
| Sex | Yes | The College will ensure that all employees will be able to access support regardless of their sex.Regular communication to all employees what supports the College offer, e.g. Employee Assistant programme etc. | Yes | In general, male employees are less likely to seek wellbeing and counselling support when needed. Therefore, managers / colleagues should encourage male employees to seek support where they have concerns about their welfare. Female staff may be reluctant to disclose their menstrual health problems. |
| Sexual orientation | Yes | LGBT employees may have faced additional challenges in their lives, such as homophobic or transgender discrimination, with subsequent possible negative effects on their mental wellbeing – provision of a consistent and supportive framework is likely to be a positive support for LGBT employees. | Yes | LGBT employees may not wish to disclose their sexual orientation to their manager, which makes them difficult for seeking any supports they require although it’s available.  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| OthercharacteristicSee Note 7 | PotentialPositive Impact Y/N | Details of Expected Positive Impact | Potential Negative Impact Y/N | Details of Expected Negative Impact |
| Social deprivation | Yes | Employees who have experienced social deprivation may have faced additional challenges in their lives, with subsequent possible negative effects on their mental wellbeing – provision of a consistent and supportive framework is likely to be a positive support for all employees who have experienced social deprivation.  | Yes | Employees who have experienced social deprivation may not wish to disclose their background, which makes them difficult for seeking any supports they require although it’s available. |
| Care Experienced people | Yes | Employees who are care experienced may have faced additional challenges in their lives, with subsequent possible negative effects on their mental wellbeing – provision of a consistent and supportive framework is likely to be a positive support for care experienced employees.  | Yes | Employees who are care experienced may not wish to disclose their background, which makes them difficult for seeking any supports they require although it’s available. |
| People with caring responsibilities | Yes | Employees who have caring responsibilities may end up feeling overwhelmed by them. Support provided through this procedure and potential early intervention will be more helpful for employees with caring responsibilities. | Yes  | Employee with caring responsibilities may be reluctant to ask for/request the different treatment for fear of being viewed as less reliable/committed etc.  |
| Any other groups that need to be taken in consideration? |  No |  | No |  |

**Step 4 – Acting on the results of the assessment.**

|  |  |
| --- | --- |
| What actions can be taken or amendments made to policy to reduce the negative impact?See note 8 | There may be additional support required for LGBT employees or employee who have experienced social deprivation to support, especially for their mental welfare. Regular and more frequent communications to all employees regarding to mental health support the College supply may encourage early intervention of attendance issues.Ensure all managers to be aware that there are variety of guidance for supporting employees in Manager Portal. |
| Is there a need to address any gaps in evidence? | Going forward HR can monitor the protected characteristics of those employees who participate in this procedure and review and identify if particular groups are disproportionately being referred/self-referred to this procedure.Will collect the feedback from HR Partner who works closely with managers for dealing with Attendance issues and analyse them. Regular requests for general feedback on the implementation of this procedure from the Unions at local JNC meetings.  |
| How will equality be advanced/ good relations be fostered? | This updated procedure enables and supports employees and managers to understand the processes and what supports they are provided by the College. |
| Who has been involved in carrying out this assessment?  | This procedure will be reviewed and approved by the Senior Management Team and the Executive team will review and monitor this procedure, on an ongoing basis, will take into account legislative requirements and identified good practice. |
| If you cannot fully review the impact now, what else must be done, by/with whom and why? |  |

|  |  |  |
| --- | --- | --- |
| **Recommended decision:** (place an x against relevant outcome)See note 9 | Outcome 1: Proceed – no potential identified for discrimination or adverse impact, and all opportunities to promote equality have been taken |  |
| Outcome 2: Proceed with adjustments to remove barriers identified or to better promote equality | **X** |
| Outcome 3: Continue despite having identified some potential for adverse impact or missed opportunity to promote equality |  |
| Outcome 4: Stop and rethink as actual or potential unlawful discrimination has been identified |  |
| Any other recommendations?  |
|  |

**Step 5: The monitoring and review stage**

|  |
| --- |
| **Plan actions to reduce negative impact, advance equality and monitor the impact of the policy, proposal or decision*** Please indicate if there is any data which needs to be collected as part of action to be taken and how often it will be analysed.
* Indicate how the person responsible will continue to involve relevant groups and communities in the implementation and monitoring of the policy, etc.
* How will the impact of the policy/procedure/decision be monitored?

See Note 10 |
| **Action to be Taken:**  | **Person Responsible:** | **Completion/Review Date:** |
| Run quarterly statistical reports on cases which were active/live during this period by each protected characteristic to identify if those in any particular group(s) are being disproportionately affected. | Systems Team (Irene Michie) | Ongoing - Quarterly |
| Regular reviews with SMT & Exec team for ensuring this procedure being up to date in line with legislative requirements and identified good practice. | Sue Clyne  | Ongoing |
| Provide support and guidance to managers at early stage of attendance issues | HR Partners | Ongoing |
| Undertake a 3-yearly review of the procedure, or sooner if legislative changes require it, to ensure it remains in line with current legislation, terminology etc. | Sue Clyne (as part of the management/union group) | Ongoing – every 3 years |
| Distribute positive messages, on a regular basis, about the confidential support employees can access as and when needed | Sue Clyne | Ongoing |
|  |  |  |
| **Signature of Lead:**   **Date: 7 November 2024** |

**Step 6 – Review and Publication**

See Note 11

Please send the completed EIA record to equality@edinburghcollege.ac.uk for

* review by Quality and Improvement;
* publication in whole or in part on the College website.

|  |  |
| --- | --- |
| **Date of Review** | **11 December 2024** |
| **Date of Publication** | **11 March 2025** |