

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

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

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| Title of Activity/Proposal /Policy/Practice | Reasonable Adjustment Policy and 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 HR Systems Assistant)  HR Partners | Date | 11.12.24 |
| Type of Policy/Practice/ (tick box) | New | X |
| Existing |  |
| Revised |  |

**Step 1 – Plan your process**

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

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| What are the aims and purposes of the activity/ decision/ new or revised policy or procedure?  See Note 1 | Edinburgh College is committed to creating an organisation that supports and accommodates employees to enable them to achieve their potential at work.  The aim of this policy and procedure is to set out the process for requesting and making reasonable adjustments at Edinburgh College in line with the Equality Act 2010. |
| Who will be affected?  See Note 2 | This policy and procedure is applicable for all employees and applicants applying for roles, or already in employment, at Edinburgh College. |
| Who will be consulted?  See Note 3 | This policy and procedure is agreed between EIS-FELA and the Board of Management of the College. |

**Step 2 – Consider the Evidence**

What is the evidence we need and how we can gather it?

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| 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 | As this is a new policy and procedure, it is not possible to gain specific evidence of the impact on applicable employees and job applicants yet.  Going forward, monitoring requests from employees and job applicants, and collecting the feedback from people (if possible) who have agreed adjustments in place could be considered.  Additionally, we will monitor cases relating to capability, absence and grievance policies and procedures, that might be related to the requirement for adjustments to be made.  Ensure this policy and procedure is available on the intranet and circulated to all employees so applicable employees and their managers can understand and follow this policy and procedure properly.  Ensure job applicants are offered adjustments if required during the recruitment process and that, where someone is appointed with a disability that requires adjustments to be made, this is done within the first 6 weeks of employment. For other employees, managers need to ensure that they are engaged in the process with their employees where work situations, and individual needs, change. |

**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?

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| **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, job applicants and managers.  The detailed and step by step guidance for requesting and perusing reasonable adjustments help all affected people. | This policy and procedure provides wide range of examples of adjustments for covering both physical and mental aspects, that could be arranged. Additionally, we always could seek specialist advices if necessary. | This policy and procedure will be well publicised to all employees and provides the full guidance of reasonable adjustments processes.  The College also provides variety of related training as maintaining knowledge about diversity and disability which is vital to eliminate any discrimination against affected employees and job applicants.  Foster a culture of openness so enabling applicable employees to come forward and to request reasonable adjustments if needed. |

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** | **Potential**  **Positive Impact Y/N** | **Details of Expected Positive Impact** | **Potential Negative Impact Y/N** | **Details of Expected Negative Impact** |
| --- | --- | --- | --- | --- |
| Age | Yes | Liaise and work collaboratively with Occupational Health, HR, H&S team and other relevant colleagues while working through this procedure to ensure the right outcome for their employee(s) | Yes | Older employees are more likely to develop disabilities and need adjustments at work. |
| Disability | Yes | On the recruitment advert page, applicants with disabilities are encouraged to apply the role and they are guaranteed to be interviewed if they meet the essential requirements for the role.  Several related policies and procedures are in place.  The college holds the Disability Confident award | Yes | Employee or job applicant may be reluctant to request reasonable adjustment as they may fear they could be viewed as being less capable. |
| Gender reassignment | Yes | This policy and procedure covers health conditions. The college does not ask about sickness absence in recruitment references. The college has a Trans and Non-Binary Inclusion Policy in place and has delivered training to managers. | Yes | People who are transitioning, or have transitioned, may have had more sick leave than others.  Trans employees may require reasonable adjustments during the transitioning period. |
| Marriage/civil partnership (relevant in employment law) | Yes | This Policy and Procedure applies fairly to all employees regardless they are in marriage or in civil partnership. | No | No negative impact has been identified. |
| Pregnancy and Maternity | Yes | Several related policies and procedures, on flexible working and family friendly are in place and they are well developed health and safety processes for pregnant employees and those on maternity leave. | Yes | After coming back from maternity leave, it may be difficult to achieve a work-life balance, which may contribute to long-term health issues. |
| Race | Yes | This policy and procedure will be well publicised to all employees to understand fully their right to reasonable adjustments. | Yes | Disclosing disability or mental health problems to their managers for accessing support/adjustments may be difficult for employees of certain ethnic groups. |
| Religion or belief | Yes | This policy and procedure will be well publicised to all employees to understand fully their right to reasonable adjustments. | Yes | Disclosing disability or mental health problems to their managers for accessing support/adjustments may be difficult for employees of certain faith groups. |
| Sex | Yes | A national Menopause policy is in place.  The College will ensure that all employees will be able to access support regardless of their sex or gender. | Yes | Menopause is not registered as a protected characteristic but it can be considered by an Employment Tribunal as other characteristics such as age, disability and sex.  Managers are also encouraged to provide reasonable adjustments for those who experience acute menstrual health problems.  In general, male employees tend to reluctant to ask support even though the offers are in place. |
| Sexual orientation | Yes | This Policy and Procedure applies fairly to all employees regardless of their sexual orientation. | Yes | Employees may be reluctant to seek reasonable adjustments in relation to their sexual orientation because of fear of stigma and prejudice. |

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| **Other**  **characteristic**  **See Note 7** | **Potential**  **Positive Impact Y/N** | **Details of Expected Positive Impact** | **Potential Negative Impact Y/N** | **Details of Expected Negative Impact** |
| Social deprivation | Yes | Access to Work is regularly used to support new employees, and existing employees who develop a disability, in the workplace. | Yes | The reasonable adjustment may improve their work conditions but they may worry about the cost. Costs of adjustments are met by the employer or Access to Work so the employee is not required to contribute financially. |
| Care Experienced people | Yes | The College will ensure that all employees will be able to access support. | Yes | The potential disruptive upbringing may impact their mental status, but they may not be aware of this policy and procedure and not seek support. |
| People with caring responsibilities | Yes | This procedure explains both physical and non-physical adjustments, that may help their circumstances to improve. | Yes | Those employees or job applicants are more vulnerable to mental illness as it may find it difficult to manage their work life balance. |
| Any other groups that need to be taken in consideration? | No |  | No |  |

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

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| What actions can be taken or amendments made to policy to reduce the negative impact?  See note 8 | First of all, this is a new policy and procedure, so ensure that this will be well publicised to all employees for them to understand their right and processes fully.  Managers will be trained in the implementation of this policy and procedure. The College also provides variety of related training as maintaining knowledge about diversity and disability is vital to eliminate any discrimination against affected employees and job candidates. |
| Is there a need to address any gaps in evidence? | Going forward HR can monitor the protected characteristics of those employees who are managed/supported through this policy and procedure, and review and identify if particular groups are disproportionately being affected. |
| How will equality be advanced/ good relations be fostered? | This Policy and procedure provides a detailed and step by step guidance of reasonable adjustments. By receiving a variety of relevant training, managers will fully understand for the implication of this policy and procedure. |
| Who has been involved in carrying out this assessment? | HR team. |
| If you cannot fully review the impact now, what else must be done, by/with whom and why? | See above comments |

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

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| **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:** |
| Arrange training for managers on this policy and procedure so they can implement it appropriately and supportively. | Sue Clyne/Nyree Grierson | Ongoing |
| Provide an additional support if required | HR Partners | Ongoing |
| Monitor how many reasonable adjustments request are made and are arranged successfully. | HR Systems team | Ongoing |
| Collect feedback from HR partners, HR Coordinators, and H&S team | Sue Clyne | Ongoing |
| Regular reviews at LNC meetings to be undertaken with Unions to request any appropriate general feedback on the impact of the implementation of this policy and procedure. | Sue Clyne | Ongoing |
| Undertake a 3-yearly review of this policy and procedure, or sooner if legislative changes require it, to ensure it remains in line with current legislation, terminology etc. | Sue Clyne | Ongoing |
| **Signature of Lead:**   **Date: 12 December 2024** | | |

**Step 6 – Review and Publication**

See Note 11

Please send the completed EIA record to [equality@edinburghcollege.ac.uk](mailto:equality@edinburghcollege.ac.uk) for

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

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| **Date of Review** | **17 December 2024** |
| **Date of Publication** | **11 March 2025** |