



Equality Impact Assessment Record Form

Pandemic Influenza Policy

Equality Impact Assessments

Directorate	Service	Person responsible for the assessment	Date assessment completed
Resources	Human Resources/Organisational Development	Sally Morgan	03/09/2009
Title of the policy being assessed	Pandemic Influenza – Employment Issues		
The status of the policy	New		
1. What are the aims, objectives and purposes of the policy?	This policy outlines the HR (Human Resources) principles to be used in the event of a flu pandemic and is intended to provide guidance to service managers and employees.		
2. Does the policy support other objectives of the council?	Yes, the objectives of the Emergency Planning, Business Continuity, Health and Safety services in general and Corporate values of Equality and Diversity, Valuing Staff and Sustainability. It also supports the Combined Equality Strategy.		
3. Who is intended to benefit from the policy, and in what way?	<p><u>All Managers</u> – a framework for dealing with the event of a pandemic flu outbreak</p> <p><u>All employees</u> – guidance in the event of a pandemic flu outbreak and ensuring health and safety. General information provision. Extra guidance for vulnerable groups (section 9 of the policy).</p> <p><u>All customers & service users</u> – to ensure as much as possible, business continuity and to protect their health and safety – through encouraging employees to practice good hygiene and not to attend work if not well enough.</p>		
4. What outcomes are anticipated from the policy being in place?	<p>A framework in place to deal with employment related issues during a pandemic outbreak once the policy has been invoked, as well as linking to business continuity and the health and safety of customers and colleagues alike.</p> <p>A source of reference and guidance for all employees.</p>		

5. Identify and select your assessment team.	Name		Role		Responsibilities			
	Sally Morgan Rod Lee		HR Officer HR Advisor		Lead on assessment Assistance with Assessment			
6. What data have you gathered for this assessment? How have you analysed this data?	Source and Age of Data		Owner		Findings		Data Gaps	
	Flexible working survey (2008)		Human Resources		Caring responsibility statistics		The data can only be broken down according to gender and age. Data on sexual orientation, disability etc was not collected at this point.	
	Corporate Plan – Changing Gear (2008)		NNDC		Corporate Values		n/a	
	NHS Direct & AXA ICAS (employee assistance programme)		NHS Direct / AXA ICAS		Information regarding swine flu		The full impact of swine flu is not yet known.	
	Pandemic Flu Policy (which was revised following comment from business continuity, health and safety and UNISON)		Human Resources		Policy content		The full impact of swine flu is not yet known.	
	Staff Survey (2008)		Human Resources		No of employees who consider themselves to have a disability		Information cannot be broken down according to sexual orientation or religion and belief as we did not collect this information.	

	Representations from employees (Including – Organisational Development Equality Impact assessment team; Community Liaison Officer & UNISON representative)	n/a	A number of changes were made as a result of the consultation. See Appendix A.	n/a
	'BVPI' – 'Best Value Performance Indicator' figures and Cognos reports (Cognos is a tool that allows us to create reports from the information held on the Human Resources computer system)	Human Resources	A number of areas – e.g. number of staff who have declared themselves as disabled.	Information on the HR system cannot be broken down according to sexual orientation or religion and belief as we do not currently collect or hold this information.
	Norfolk County Council Equality Impact Assessment Tool	Norfolk County Council	Figures on sexual orientation in Norfolk.	This is for Norfolk, rather than the North Norfolk District, but was the only information available.
	North Norfolk District Councils accessibility matters standards	North Norfolk District Council	Guidelines on how to make information more accessible	n/a
	Census Figures (2001)	Office for National Statistics	Background information on equality groups in the local area	The census did not collect data on sexual orientation.
	<p>As the policy is new and has not yet been approved or invoked, it is not possible to analyse data in terms of <i>actual</i> impact the policy may have on these different equality groups (listed in points 8-13 below). Swine flu (the most recent pandemic) is also new, and the effects have been predicted but are largely unknown.</p> <p>The existing data we have about the make up of the workforce has been used and applied where possible to the appropriate equality category (covered below in points 8-13) as to try to anticipate where there may be more impact than others and areas in the policy which assist or mitigate are highlighted.</p>			

7. Who are the main stakeholders of this policy?	Community <ul style="list-style-type: none"> Customers/Constituents 	Staff/Members <ul style="list-style-type: none"> Employees Management Members Trade Unions Business Continuity & Health & Safety teams 	Partners
8. Are there any concerns that the policy could have a negative impact with regard to race and ethnicity?	<p style="text-align: center;">No</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies equally to all employees regardless of their race and/or ethnicity. The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background and there is an Equalities statement built into the Pandemic Influenza Policy to reinforce this.</p> <p>The policy has not yet been invoked so the true impact on those most affected is not truly known. 1.45% of our staff currently are of an ethnic minority group, compared to 0.78% of North Norfolk (2001 census) and therefore is more than representative of the population. There does not appear to be any evidence that a particular racial/ethnic group is any more at risk.</p> <p>We therefore believe that this policy should not have a differential impact based on race or ethnic origin.</p>	
9. Are there any concerns that the policy could have a negative impact with regard to gender?	<p style="text-align: center;">No</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies equally to all employees regardless of their gender. The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background and there is an Equalities statement built into the Pandemic Influenza Policy to reinforce this.</p> <p>The policy has not yet been invoked so the true impact on those most affected is not truly known. However there is some indication that gender is a</p>	

		<p>factor in the level of risk associated with swine flu (pregnant women are listed as a vulnerable group – NHS Direct), there is special guidance for vulnerable groups in Section 9 of the Policy. It is recognised that those people in vulnerable groups may take longer to recover but they will not be penalised under the Council's trigger system (see Attendance Policy), as absences by reason of pandemic flu will be recorded but not counted for this purpose.</p> <p>Flexible Working Survey results inform us that the women in our work force are more likely to having caring responsibilities (children or otherwise), therefore it is more likely that women will need to provide care for a dependant who has contracted pandemic flu. NHS Direct state that people aged 65 or older and young children under five are vulnerable; these are possible groups of dependants for our employees. Caring responsibilities are covered in the policy in sections 13 & 14.</p> <p>Women are more likely to be working part time (40.7% of women, compared to 16.5% of men at North Norfolk District Council). Therefore to ensure that all employees receive the information on the policy, any briefing sessions would need to be timed appropriately to catch as many employees as possible – e.g. different days of the week, times etc. The policy should also be communicated in a number of different formats – intranet, briefing newsletter, team briefings etc. All communications should comply with the Council Accessibility Matters Standards.</p> <p>We therefore believe that this policy should not have a differential impact based on gender.</p>
<p>10.Are there any concerns that the policy could have a negative impact with regard to disability?</p>	<p>No</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies equally to all employees regardless of whether or not they have a disability. The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background and there is an Equalities statement built into the Pandemic Influenza Policy to</p>

		<p>reinforce this.</p> <p>The policy has not yet been invoked so the true impact on those most affected is not truly known. However those with certain disabilities covered under the act will be in the vulnerable/at risk groups (covered in section 9) for example MS sufferers. These people may be more at risk and have a longer recovery time. However, those with a disability that makes them more vulnerable have specific advice in section 9 and the policy is also clear that sickness absence by reason of pandemic flu will be recorded but not counted under the Councils Trigger System (see Attendance Policy). This means that those in vulnerable groups/disabled will not be penalised for taking longer to recover under the Attendance Policy.</p> <p>5% of staff indicated that they considered themselves to be disabled in the 2008 Staff Survey. Current records state that (as at 25/08/2009), 12 employees (3.48%) have declared that they are disabled.</p> <p>We therefore believe that this policy should not have a differential impact based on whether or not an employee has a disability.</p> <p>This policy should be communicated in a number of different forms – e.g. intranet, team briefing & briefing newsletter. Communications would need to comply with the Council’s Accessibility Standards.</p>
<p>11. Are there any concerns that the policy could have a negative impact with regard to age?</p>	<p>No</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies equally to all employees regardless of age. The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background and there is an Equalities statement built into the Pandemic Influenza Policy to reinforce this.</p> <p>The policy has not yet been invoked so the true impact on those most affected is not truly known. However, ICAS information states that those of what is generally accepted to be ‘working age’ (16-65) are least at risk, which</p>

		<p>is supported by NHS Direct data. However at NNDC there is not a default retirement age and therefore is potential for those over 65 to continue to work with us. We currently have 4 employees who are over the age of 65. (13.21% of people in the North Norfolk District are over 65, according to 2001 census).</p> <p>Those over 65 are considered to be a vulnerable group. It is recognised that those people in vulnerable groups may take longer to recover but they will not be penalised under the Council's trigger system (see Attendance Policy, Section 6), as absences by reason of pandemic flu will be recorded but not counted for this purpose (see section 10 of Pandemic Influenza Policy). The NHS reports though, that the majority of cases so far have been in those under 60.</p> <p>The other age group the NHS considers to be vulnerable, is children under 5. These are clearly not present in the workforce, but may be dependants of employees in the workforce. There is also evidence from the Flexible Working Survey that Women are more likely to have some kind of caring responsibilities between the ages of 36-55. Approximately 39% of our workforce are females in this group, so it is a significant proportion (correct at 25/08/2009). This is covered above, and in sections 13 & 14 of the pandemic flu policy.</p> <p>Young children who are customers of the Council e.g. those who use services at the Sports Centre will not be any less protected should the policy be invoked – any temporary redeployments to cover in such areas will only be possible where there is satisfactory Criminal Records Bureau (CRB) clearance (see section 19).</p> <p>We therefore believe that this policy should not have a differential impact based on age.</p>
<p>12.Are there any concerns that the policy could have</p>	<p>No</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p>

<p>a negative impact with regard to religion/belief?</p>		<p>This Policy applies equally to all employees regardless of religion/belief. The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background and there is an Equalities statement built into the Pandemic Influenza Policy to reinforce this.</p> <p>The policy has not yet been invoked so the true impact on those most affected is not truly known. There does not appear to be any evidence that a particular religious/belief group is any more at risk.</p> <p>There is however currently no data on the profile of the workforce with regard to religion/belief. The 2001 census stated that only 0.69% of respondents in North Norfolk stated that they had a belief other than Christianity. It is currently not possible to conclude the impact of the policy according to religion.</p>
<p>13.Are there any concerns that the policy could have a negative impact with regard to sexual orientation?</p>	<p>No</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies equally to all employees regardless of sexual orientation. The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background and there is an Equalities statement built into the Pandemic Influenza Policy to reinforce this.</p> <p>The policy has not yet been invoked so the true impact on those most affected is not truly known. There does not appear to be any evidence that a particular sexual orientation group is any more at risk.</p> <p>There is however currently no data on the profile of the workforce with regard to sexual orientation. According to Norfolk County Council, 6% of Norfolk's population are lesbian, gay or bisexual. It is not currently possible to conclude the impact of the policy according to sexual orientation.</p>

<p>14. Could the negative impact you have identified in questions 8 - 13 lead to the potential for adverse impact if the policy is implemented?</p>	<p>No</p>	<p>It is hoped that the impacts identified have been addressed by the content of the policy – for example sections 9 &10 for vulnerable groups (covering age and disability) and sections 13 &14 on caring responsibilities (which relates to gender and age). Where redeployments are made due to staff shortages, these will be appropriate – for example only CRB checked and approved staff to work with children, as well as vulnerable adults.</p> <p>As the policy is a new policy and has not yet been approved or invoked, the true impact is yet to be seen. It is recognised that there may be impacts which have not been anticipated. These would need to be addressed via the review process.</p>
<p>Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group?</p>	<p>N/A</p>	<p>Not applicable</p>
<p>Or any other reason?</p>	<p>N/A</p>	<p>Not applicable</p>
<p>Can the impact be mitigated by existing means?</p>	<p>Yes</p>	<p>Yes see above (question 14).</p>
<p>If yes, what actions will you undertake to mitigate these impacts and revise the policy?</p>	<p>N/A</p>	<p>Not applicable – it is felt that the content of the policy covers the impacts anticipated at present. As above, this policy will go through a scheduled review process after one year, or sooner where amendments are found to be more immediately necessary.</p>

15. Describe the arrangements for reporting and publishing this assessment.	This assessment will go to JSCC (Joint Staff Consultative Committee) and Members through the normal Policy development framework. This assessment will be reported to the Equality and Diversity Board and will be published on the NNDC external website (www.northnorfolk.org)		
Has this assessment been undertaken by a minimum of two staff?	Yes	Has this assessment been scrutinised by your Directorate Steering Group?	This has been scrutinised by Organisational Development Equality Impact Assessment team
If the policy is new, or requires a decision by Councillors to revise, has this Equality Impact Assessment been included with the report?			Yes
Have any actions identified in this assessment been included in your service equality and diversity action plan?			See Appendix B
Completed by:			Signed off by:

Appendix A – Consultation information and Edits

People involved in the assessment:

- Sally Morgan – HR Officer
- Rod Lee – HR Adviser
- Julie Cooke – Organisational Development Manager
- David Smith – Performance & Risk Assistant
- Kate Davison – HR Assistant
- Kate Sullivan – Community Liaison Officer
- Andy Mitchell – UNISON representative

Actions taken after consultation:

- Expanded acronyms to full versions to make the assessment as accessible to all as possible (from DS & RL), as well as some minor changes to wording – following comment from DS.
- Additional conclusions for clarity in religion/belief and sexual orientation sections and references to vulnerable adults and communication methods, following comment from KS.
- Additional words added to section 6a for clarity, following discussion with AM (UNISON). AM also made additional comments regarding section 9 - 'We know that the Council employs a significantly greater number of women than men and that women in the workforce are more likely to have caring responsibilities. The Council will need to monitor carefully how women who require to undertake those caring responsibilities are treated in terms of the flexibility that managers employ in enabling them to do so.' Therefore the action regarding flexible working was added to Appendix B

Appendix B – Action Plans

Action	Expected Outcome	Person responsible	Target date	✓
Collect data on employee's Religion and Belief/ Sexual Orientation. Revised Equal Opportunities form for all existing and new staff.	Up to date information on staff profile in terms of equality strands. Information collected that was not previously available. Data available to report on – fills gap in data.	Sally Morgan	By March 2010, ready to report on.	
Change 'Equal Opportunities' to 'Equalities' where used	Maureen Clarke advises Equal Opportunities is not often used to cover the area, rather equalities as this covers both equality of opportunity and equality of outcome	Anybody writing a new/revised HR policy	Ongoing	
Clarification on flexible working options available to staff and for management to consider; as well as some guidance the practical elements to be considered in deciding which, if any, of the options to apply. This would be achieved via a flexible working policy, which would be a separate document, but would link to this procedure	Clarification and guidance to ensure increase information available transparency and consistency in the application of flexible working options.	Sally Morgan	Late 2010	
Review policy and equality impact assessment 12 months after agreed	Continuing commitment to equality, where changes have been made, or new evidence is available	Sally Morgan	c12 months	

