



Equality Impact Assessment Record Form

Attendance Policy

Equality Impact Assessments

Directorate	Service	Person responsible for the assessment	Date assessment completed
Resources	Human Resources/Organisational Development	Sally Morgan	06/10/2009
Title of the policy being assessed	Attendance Policy (2007) (introduced April 2008)		
The status of the policy	Existing but a review is currently underway.		
1. What are the aims, objectives and purposes of the policy?	<p>This policy aims to provide understanding and a positive, fair, sensitive and consistent framework for managing staff attendance.</p> <p>It aims to support staff and provide guidance on how to manage staff attendance.</p> <p>Sets out roles and responsibilities for employees, managers and human resources in relation to the policy.</p>		
2. Does the policy support other objectives of the council?	<p>Yes:</p> <ul style="list-style-type: none"> • Business continuity – maintaining service delivery, planning to cover absence, and updating staff on new developments on their return. • The corporate plan ‘Changing Gear’ – corporate values of ‘Valuing Staff’ – by providing support to those who need it; ‘Equality & Diversity’ – supporting people to maintain attendance if required, reasonable adjustments for those who need them; ‘Continuous Improvement’ – trying to improve our absence figure, which is higher than some other local authorities. • Looking after the wellbeing of our staff and supporting wellbeing initiatives/services such as ‘Fit for business’, the Employee Assistance Programme and the use of Occupational Health. • Disciplinary Procedure – this policy links to the disciplinary procedure under section 8 where frequent short term absences that have been investigated and there is found to be no acceptable reason for, would be dealt with under the Disciplinary Procedure. At present there is no agreed capability procedure, so in the case of capability, issues will be dealt with using the principles of the disciplinary procedure (the disciplinary procedure has its own equality impact assessment). • Grievance Procedure – if an employee feels they have not been treated fairly under this policy they are able to raise a grievance (this procedure has its own equality impact assessment). • Health and Safety – risk assessments relating to health issues are carried out as and when appropriate. 		

	<ul style="list-style-type: none"> • The Local Government Pension Scheme (LGPS) – Ill Health Retirement may be an option for some employees with ongoing health problems, provided that they are pension scheme members and meet the relevant criteria. This is mentioned in section 8, although the pension regulations have changed so this will need updating. • Legal compliance – for example with the Disability Discrimination Act 1995 (as amended), Sex Discrimination Act 1975; 1983. • The Maternity Scheme links to this policy in terms of pregnancy related sickness, although there is no mention of this in the policy. 		
<p>3. Who is intended to benefit from the policy, and in what way?</p>	<p><u>All employees</u> – provides information and a framework under which attendance will be managed; provides support to staff where necessary and appropriate.</p> <p><u>All managers</u> – provides a framework, guidance and information to help manage employees and their attendance; also better quality of management information by ensuring that absence is recorded accurately and consistently</p> <p><u>Trade Unions</u> – a framework on how attendance will be managed and the role of trade union representatives as companions where appropriate.</p> <p><u>All customers & service users</u> – by maintaining service delivery as well as providing staff who are appropriately supported</p> <p><u>ICAS (Employee Assistance Programme)</u> – Provides the telephone advisers with contextual information on which they can base their advice, when contacted by a member of staff</p> <p><u>Human Resources</u> – guidance for inputting and recording sickness as well as for where triggers are met and in supporting Managers who are using the policy</p>		
<p>4. What outcomes are anticipated from the policy being in place?</p>	<p>A better system of recording absence.</p> <p>Support offered to staff where appropriate.</p> <p>A mechanism for handling frequent short term absences, which was not previously documented.</p> <p>Managers having a better understanding of their role in managing attendance.</p>		
<p>5. Identify and select your assessment team.</p>	<p style="text-align: center;">Name</p>	<p style="text-align: center;">Role</p>	<p style="text-align: center;">Responsibilities</p>
	<p>Sally Morgan Consultees (see Appendix A)</p>	<p>HR Officer Various</p>	<p>Lead on assessment Consultees</p>

6. What data have you gathered for this assessment? How have you analysed this data?	Source and Age of Data	Owner	Findings	Data Gaps
	Review meeting data since April 2008	Human Resources	See Appendix C	It is not possible to analyse this data by sexual orientation or religion/belief group as we do not currently hold this data.
	Ill Health Retirement Figures (from a cognos leavers report) for 12 months to 31/08/2009 (Cognos is a tool that allows us to create reports from the information held on the Human Resources computer system – 'Resource link')	Human Resources	The number of ill health retirements analysed by age, gender, disability and race/ethnicity. There were two ill Health Retirements in the 12 month period considered (01/09/2008 – 31/08/2009). Both were male, 'White British' and over 50 years of age. Neither had declared themselves as disabled.	It is not possible to analyse this data by sexual orientation or religion/belief group as we do not currently hold this data.
	Workforce Profile Data from Cognos (Cognos is a tool that allows us to create reports from the information held on the Human Resources computer system – 'Resource link')	Human Resources	Data on the workforce including age profile, gender profile, number of employees declaring themselves as disabled; racial/ethnic group of employees.	No workforce profile by sexual orientation or religion/belief group as we do not currently hold this data.
	Employers forum on Disability (2009)	Employers forum on Disability	<i>'Disabled people in work tend to have better attendance records, stay with employers longer and have fewer accidents at work.'</i>	n/a

	INTRAN pages of intranet	Maureen Wells	Services that INTRAN can offer	n/a
	Grievance data (From the Discipline and Grievance Spreadsheet; data since April 2008)	Human Resources	One grievance has been taken out regarding the policy. This was not relating to discrimination by any of the 6 groups mentioned in sections 8-13 of this assessment.	It is not possible to identify the religion/belief group or sexual orientation of the individual who took up the grievance. However, as there is only one case, it would not be a significant analysis. The fact that the data only begins in April 2008 is not significant in this instance as this coincides with the introduction of the Attendance Policy.
	Views from employee representatives regarding the assessment	Human Resources	Changes made following this consultation are listed in Appendix A.	n/a
	North Norfolk District Councils accessibility matters standards	North Norfolk District Council	Guidelines on how to make information more accessible	n/a
7. Who are the main stakeholders of this policy?	Community		Staff/Members	Partners
			<ul style="list-style-type: none"> • All employees • All managers • Members • Human Resources • Trade union representatives 	<ul style="list-style-type: none"> • Occupational Health • ICAS (Employee assistance programme providers)
8. Are there any concerns that the policy could have	No	What evidence (actual data or assumptions) do you have to support this?		

<p>a negative impact with regard to race and ethnicity?</p>		<p>This policy applies the same standards to all members of staff regardless of race/ethnicity; although there is room for discretion where emergency health situations, such as hospitalisation will not invoke a trigger (see section 6.1 of the policy). A selection of employees were involved in the formation of the policy via a working group and the procedure itself went through a consultation process with UNISON which would highlight issues of inequity.</p> <p>The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background. However there is no 'equalities statement' in this procedure to reinforce the Policy.</p> <p>'INTRAN' services (translation) would also be available if there was a need to communicate the policy in another language, for example.</p> <p>There were two ill health retirements in the 12 month period prior to this assessment being completed (01/09/2008-31/08/2009). Both employees were of 'White British' ethnic origin, but given the ethnic make-up of the workforce at North Norfolk District Council (95.4% White British) this is neither surprising, nor deemed to be of significance. 94.23% of the absence review meetings held were with White British employees, which is also consistent with the race/ethnicity composition of the workforce.</p> <p>It is therefore not felt that there is any evidence that the policy has had an adverse impact on any racial or ethnic group.</p>
<p>9. Are there any concerns that the policy could have a negative impact with regard to gender?</p>	<p>Yes – more clarity is needed</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies the same standards to all members of staff regardless of gender; although there is room for discretion where emergency health situations, such as hospitalisation will not invoke a trigger (see section 6.1 of the policy). A selection of employees were involved in the formation of the policy via a working group and the procedure itself went through a consultation process with UNISON which would highlight issues of inequity.</p> <p>The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background. However there is no 'equalities</p>

	<p>statement' in this procedure to reinforce the Policy.</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 any changes to the policy in the future, 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 procedure 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>In addition to considering part time employees in the communication of the policy, related training and so on, there may also be another indirect effect on women. As more women are working part time, they may not be able to so easily comply with the requirement that a return to work interview should be held within three days (see section 5.1 of the policy). If this was three working days, then this would be more consistent to part and full time employees.</p> <p>Women may also be penalised if pregnancy related sickness is taken into account for the purposes of discipline under the policy. It is the opinion of the Human Resources team that due consideration would be given to pregnancy related factors when using the policy, but there is no mention of this within the policy document itself.</p> <p>There were two Ill health retirements in the 12 month period prior to this assessment being completed (01/09/2008-31/08/2009). Both employees were male, and there are actually more females in the workforce at North Norfolk District Council; however due to the size of the sample this is not felt to be significant.</p> <p>Whilst more females than males have attended 'review meetings' under this policy, it is not felt to be significant as there are more women than men in the work force at North Norfolk District Council. As there is limited data available (due to the policy only being introduced in May 2008), this would need to be monitored in future to ensure that this is not a significant trend.</p>
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		<p>It is therefore not felt that there is any evidence that the policy has had an adverse impact on either gender, however it is felt that further clarity is needed regarding pregnancy related absence.</p>
<p>10. Are there any concerns that the policy could have a negative impact with regard to disability?</p>	<p>Yes – further clarification regarding health capability procedure</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies the same standards to all members of staff regardless of disability status, although the Disability Discrimination Act 1995 (as amended) will need to be considered; this is mentioned in section 8 and also the principle of reasonable adjustments is mentioned in section 7.8. There is room for discretion where emergency health situations, such as hospitalisation will not invoke a trigger (see section 6.1 of the policy).</p> <p>A selection of employees were involved in the formation of the policy via a working group and the procedure itself went through a consultation process with UNISON which would highlight issues of inequity.</p> <p>The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background. However there is no 'equalities statement' in this procedure to reinforce the Policy.</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. 'INTRAN' services (translation) would also be available if there was a need to communicate the policy in sign language or Braille for example.</p> <p>Whilst there is reference to compliance with the Disability Discrimination Act regarding issues of health capability, there is no 'capability procedure' outlined in this document or as a standalone procedure. This needs to be drawn up and assessed.</p> <p>None of the people who have been ill health retired in the 12 month period to 31/08/2009 had declared themselves as disabled. In terms of absence review meetings, 4.80% of meetings (five in total) triggered are with disabled employees, compared to 3.48% of the workforce (12 employees) being disabled. It is not known</p>

		<p>why this is, but will continue to be monitored to see if it is a prevailing trend. It is also of note that the review meetings are not necessarily punitive and would help to identify any reasonable adjustments necessary for the employee.</p> <p>Whilst the policy does not appear to be having an adverse affect with regard disabled employees, it may be improved by being clearer on what health capability procedure should be followed.</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 the same standards to all members of staff regardless of age; although there is room for discretion where emergency health situations, such as hospitalisation will not invoke a trigger (see section 6.1 of the policy). A selection of employees were involved in the formation of the policy via a working group and the procedure itself went through a consultation process with UNISON which would highlight issues of inequity.</p> <p>The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background. However there is no 'equalities statement' in this procedure to reinforce the Policy.</p> <p>In terms of the age range of those employees retired on ill health grounds, both were over the age of 50. This is not felt to be significant as the criteria for ill health retirements are based the likelihood of finding alternative work in a specified time period or prior to the age of 65. These are national regulations over which North Norfolk District Council does not have an influence. In terms of absence review meetings, these are most common between the ages of 40-49, but this is the age group where the majority of our employees fall.</p> <p>It is therefore not felt that there is any evidence that the policy has had an adverse impact regarding age.</p>
<p>12.Are there any concerns that the policy could have</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>No – But insufficient data</p>	<p>This policy applies the same standards to all members of staff regardless of religion/belief; although there is room for discretion where emergency health situations, such as hospitalisation will not invoke a trigger (see section 6.1 of the policy). A selection of employees were involved in the formation of the policy via a working group and the procedure itself went through a consultation process with UNISON which would highlight issues of inequity.</p> <p>The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background. However there is no ‘equalities statement’ in this procedure to reinforce the Policy.</p> <p>We do not currently collect information regarding the religion/belief of our employees and therefore it is not possible to analyse the use of the policy by religion/belief group. However, it does not appear that there is anything in the policy itself which appears discriminatory by reason of religion/belief. This is an area where additional evidence needs to be collected.</p>
<p>13.Are there any concerns that the policy could have a negative impact with regard to sexual orientation?</p>	<p>No – But insufficient data</p>	<p>What evidence (actual data or assumptions) do you have to support this?</p> <p>This policy applies the same standards to all members of staff regardless of sexual orientation; although there is room for discretion where emergency health situations, such as hospitalisation will not invoke a trigger (see section 6.1 of the policy). A selection of employees were involved in the formation of the policy via a working group and the procedure itself went through a consultation process with UNISON which would highlight issues of inequity.</p> <p>The Council has and operates an Equal Opportunities Policy to ensure all staff are treated fairly, regardless of their background. However there is no ‘equalities statement’ in this procedure to reinforce the Policy.</p> <p>We do not currently collect information regarding the sexual orientation of our employees and therefore it is not possible to analyse the use of the policy by sexual orientation. However, it does not appear that there is anything in the policy itself which appears discriminatory by reason of sexual orientation. This is an area where additional evidence needs to be collected.</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 style="text-align: center;">Yes</p>	<p>In practice, it is felt that the policy is applied fairly but additional work can be done with regard the health capability procedure (see section 8 of the policy) and pregnancy related sickness to ensure it is clear for all concerned.</p>	
Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group?	<p style="text-align: center;">N/A</p>		
Or any other reason?	<p style="text-align: center;">N/A</p>		
Can the impact be mitigated by existing means?	<p style="text-align: center;">N/A</p>		
If yes, what actions will you undertake to mitigate these impacts and revise the policy?	<p style="text-align: center;">N/A</p>	<p>For proposed improvements to the Attendance Policy, please see Appendix B.</p>	
15. Describe the arrangements for reporting and publishing this assessment.	<p>This assessment will be reported to the Equality and Diversity Board and will be published on the NNDC external website (www.northnorfolk.org)</p>		
Has this assessment been undertaken by a minimum of two staff?	<p style="text-align: center;">Yes</p>	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:	Sally Morgan, HR Officer	Signed off by:	Julie Cooke, Organisational Development Manager.

Appendix A – Consultation information and Edits

People consulted in the assessment:

- Kate Davison (KD) – HR Assistant
- Rod Lee (RL) – HR Advisor
- Unison representative (UR)
- Claire Bailey (CB) – Community Cohesion Officer

Actions taken after consultation:

- Amendment to section 2 – KD
- Additions to section 2; 3; & 4 - RL
- Amendment to section 6 - RL
- Addition of ICAS to sections 3 & 7 – RL
- Rewording in section 9 – CB
- Edit to section 10 - CB

Appendix B – Action Plan

Action	Expected Outcome	Person responsible	Target date	✓
Include an Equalities statement in the Attendance Policy	To link the procedure to the wider equalities agenda of North Norfolk District Council and reinforce the Equal Opportunities Policy to ensure all staff treated fairly and consistently regardless of background.	Sally Morgan, HR Officer	When Attendance Policy is reviewed – Dec 09	
Include Sexual Orientation and Religion/Belief in monitoring of employees in general and therefore in the monitoring of the use of the Attendance Policy. This would require an update from current employees and the data to be collected for all new employees. This would also eliminate areas where equality data is 'not known'.	To ensure there is no cause for concern with regard either of these groups in the application of the Policy.	Sally Morgan, HR Officer	Ready to report on March 2010.	
Review the Equality Impact Assessment on an annual basis and a full review every three years; or at the point which the policy is reviewed – whichever is sooner.	Continuing commitment to equality, where changes have been made, or new evidence is available	Sally Morgan, HR Officer	When Attendance Policy is reviewed or after 12 months – whichever is sooner	
Update Ill Health Retirement info to comply with LGPS 2008.	To ensure employees have the most up to date information and that information is consistent across policies.	Sally Morgan, HR Officer	When Attendance Policy is reviewed - Dec 09	
Change Return To Work Interview	To ensure that the same opportunity is	Sally Morgan,	When	

(RTWI) to within 3 working days and add 'usually'	given to part time employees to complete the RTWI within the timescale provided by the Policy.	HR Officer	Attendance Policy is reviewed - Dec 09	
Clarify the health capability procedure in section 8, either through more detail in the policy or through a standalone capability procedure.	To ensure that there is a procedure in place that can be fairly and consistently applied to all employees.	Sally Morgan, HR Officer	When Attendance Policy is reviewed - Dec 09	
Include reference to pregnancy related sickness and how this will be recorded/considered under the policy.	To ensure there is no room for sex discrimination to occur in the application of the policy.	Sally Morgan, HR Officer	When Attendance Policy is reviewed - Dec 09	
Continue to monitor the equality profile of those attending absence review meetings	To identify whether or not any particular group is more likely to attend a meeting and to help to identify any adverse impact	Sally Morgan, HR Officer	Already in place, but ongoing	

Appendix C – Short term absence meetings since April 2008

	Short term absence since April 2008					
	Total		Trigger met			
	Number	%	3 occs	10 days	Pattern	3 occs & 10 days
Total	104	100	18	78	0	8
M	29	27.90	5	21	0	3
F	75	72.10	13	57	0	5
White British	98	94.23	18	73	0	7
White Other	2	1.92	0	2	0	0
Black African	0	0.00	0	0	0	0
Chinese	0	0.00	0	0	0	0
Irish	0	0.00	0	0	0	0
Mixed other	0	0.00	0	0	0	0
Mixed white Asian	0	0.00	0	0	0	0
Mixed white Black Caribbean	0	0.00	0	0	0	0
Pakistani	0	0.00	0	0	0	0
Not stated	4	3.85	0	3	0	1
<20	0	0.00	0	0	0	0
20-29	18	17.31	5	11	0	2
30-39	28	26.92	8	18	0	2
40-49	34	32.69	4	27	0	3
50-59	20	19.23	1	18	0	1
60-64	4	3.85	0	4	0	0
65+	0	0.00	0	0	0	0
Not stated	0	0.00	0	0	0	0
Disabled - Y	5	4.80	0	5	0	0
Disabled - N	99	95.20	18	73	0	8

