

HR / Corporate Policy Equality Impact Analysis:

Policy / Project / Function:	Attendance Management
Date of Analysis:	04/11/16
Completed by: (Name and Department)	HR Team
What are the aims and intended effects of this policy, project or function?	The overall purpose of the policy is to set out CCG's approach to the management of absence and attendance within the workplace. The policy will also set out guidance to staff and managers about their responsibilities in relation to Attendance Management.
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	No
Please list any other policies that are related to or referred to as part of this analysis	<ul style="list-style-type: none"> • Alcohol and Substance Misuse Policy • Redeployment Policy • Disciplinary Procedure • Probationary Policy • Maternity, Adoption, career break policies • Managing Stress in the Workplace Policy
Who will the policy, project or function affect?	Employees
What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?	Consultation on the new policy has taken place nationally and locally. Consultation on the updated policy has taken place locally.
Promoting Inclusivity and Hull CCG's Equality Objectives. How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation? How does the policy promote our equality objectives:	The policy does not directly promote inclusivity but provides a framework for the handling absence ensuring staff are supported by management and health professionals

<ol style="list-style-type: none"> 1. Ensure patients and public have improved access to information and minimise communications barriers 2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job 3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve 4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs 	
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Equality Data	
<p>Is any Equality Data available relating to the use or implementation of this policy, project or function?</p> <p>Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as '<i>Equality Groups</i>'.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <ol style="list-style-type: none"> 1: Recruitment data, e.g. applications compared to the population profile, application success rates 2: Complaints by groups who share / represent protected characteristics 4: Grievances or decisions upheld and dismissed by protected characteristic group 5: Insight gained through engagement 	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document). If you answered No, what information will you use to assess impact?</p> <p>Please note that due to the small number of staff employed by the CCG, data with returns small enough to identify individuals cannot be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or issues, these should be recorded in the EIA.</p>

Assessing Impact

Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?

(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a <i>Genuine Determining Reason</i> ¹ exists (see footnote below – seek further advice in this case)
Gender			✓	<p>Staff with caring responsibilities (often women) may be recorded as sick (potential negative impact) and should be reminded that Special Leave Policies are available to deal with urgent domestic issues. On the basis that over 50% of staff in the CCG are female this is potentially significant. Since the evidence about women and men's participation in the labour market, and the reality of childcare arrangements, show that progress towards a more equal division of caring responsibilities between women and men is still very slow (Source: EHRC Briefing Paper Jan 2013). In addition to childcare responsibilities, other caring can be dealt with under a range of other CCG policies and this specific Policy requires</p>

1. ¹ The action is proportionate to the legitimate aims of the organisation (please seek further advice)

				line managers to take account of other policies before taking action. This policy supports a level of employee openness with regard to the reason for absence, which in addition to support and advice from HR colleagues should help to reduce any potential negative impact.
Age	✓			The policy applies to all staff regardless of age
Race / ethnicity / nationality	✓			The policy applies to all staff regardless of race/ethnicity/nationality
Disability			✓	<p>Negative impact: The policy is not clear how disability- related absence should be recorded. However, there is reference to disability-related absence where managers are required to take account of such circumstances.</p> <p>Any negative impact can be reduced with the close involvement of HR and Occupational Health professionals who can consider advice accompanying the Equality Act 2010.</p> <p>Positive impact: The policy advises managers to discuss any issues with the HR team where they believe reasonable adjustments or discretion should be exercised in relation to sickness absence triggers.</p>
Religion or Belief	✓			The policy applies to all staff regardless of

				religion or belief
Sexual Orientation	✓			The policy applies to all staff regardless of sexual orientation
Pregnancy and Maternity	✓			The policy applies to all staff regardless of paternity and maternity
Transgender / Gender reassignment			✓	The policy does not specify arrangements for absence connected to medical processes related to transgender issues and that any employee diagnosed with Gender Dysphoria or Gender Identity Disorder this will be covered by the normal arrangements of this policy.
Marriage or civil partnership	✓			The policy applies to all staff regardless of marriage or civil partnership

Action Planning:

As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
The policy is not clear how disability-related absence should be recorded.	Can be mitigated with the close involvement of HR and Occupational Health professionals who can consider advice accompanying the Equality Act 2010.	HR Lead	On-going monitoring	On-going monitoring through sickness reports to Senior Leadership Team and annual review of issues/incidences
The policy does not specify arrangements for absence connected to medical processes related to transgender issues and that any	The HR function should be included in the management of all such cases to ensure that decisions are made in accordance with the Equality	HR Lead	On-going monitoring	One year from implementation of the policy and reporting to Senior

employee diagnosed with Gender Dysphoria or Gender Identity Disorder will be covered by the disability discrimination provisions of the Equality Act 2010	Act provisions			Leadership Team
Monitoring this policy and particularly its effects on staff with disabilities is essential	Monitor on an on-going and annual basis	HR Lead	Ongoing	One year from implementation of the policy and as part of the regular sickness reports to the Senior Leadership Team
Staff with Caring responsibilities (often women) may be recorded as sick	Staff should be reminded that Special Leave Policies are available to deal with urgent domestic issues which should be monitored and recorded.	HR Lead	Ongoing	One year from implementation of the policy in conjunction with any recorded evidence.

Sign-off
All policy EIAs must be signed off by Mike Napier, Associate Director of Corporate Affairs
I agree with this assessment / action plan
If <i>disagree</i>, state action/s required, reasons and details of who is to carry them out with timescales:

A handwritten signature in black ink, appearing to be 'M. J. ...', enclosed within a rectangular box.

Signed:

Date: 12.05.17