



**EQUALITY IMPACT ASSESSMENT
PRELIMINARY SCREENING**

School/ Department	Human Resources
Date	March 2013

Name of Policy*
Absence Management Policy

What are the aims, objectives & projected outcomes?	
<p>The Royal Conservatoire of Scotland is committed to improving the health, well-being and attendance of all members of staff. We value the contribution our staff make to our success and therefore that contribution is lost when a member of staff is unable to be at work for any reason. The policy sets out guidelines on how to deal with absence for both staff and line managers. The policy is intended to make clear the Absence Management provisions at the Conservatoire and thereby, improve the attendance and wellbeing of all staff.</p>	
This is a new policy	N
This is a change to an existing policy <i>(Check whether original policy was equality impact assessed. If so, review and update Action Plan).</i>	Y
This is an existing policy	N

Will the policy have an impact on students, staff or members of the public?	Y
Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy?	Y
Are there any aspects of the policy that could contribute to equality or inequality?	Y

* The term 'policy' incorporates all Conservatoire procedures, processes and guidance documents

If you answer **YES** to any of these questions, go on to the full EIA.
If you answer **NO** to all of these questions, please provide appropriate evidence and sign off.

This policy was screened for impact on equalities. The following evidence has been considered. No full equality impact assessment is required.

[Insert evidence]

Senior Manager sign-off

N/A

Date

Please return the completed form to Roz Caplan, Conservatoire Equality and Diversity Officer either by internal mail or by email to: r.caplan@rcs.ac.uk

FULL EQUALITY IMPACT ASSESSMENT TEMPLATE

School/ Department	Human Resources
Date	March 2013

Name of Policy
Absence Management Policy

What are the aims, objectives & projected outcomes?
The policy is intended to make clear the Absence Management provisions at the Conservatoire and thereby, improve the attendance and well being of all staff.

1 SCOPING THE EIA

1.1 Scope of the EIA work

The Absence Management Policy was reviewed and updated in October 2012, with further minor amendments to clarify certain terms of the policy made in February 2013.

The policy aims to ensure that all members of staff are treated fairly in terms of their attendance, but now sets in place the disciplinary measures that might be taken against staff with recurrent short term absence, as well as setting in place guidance for managing employees on long-term sick.

The policy was approved by the Staff Consultative Forum

Information was gathered from other HEIs to ensure best practice is adhered to and maintained.

2 COLLECTING DATA

2.1 What relevant quantitative and qualitative data do you have?

This may include national research, surveys or reports, or research done by colleagues in similar areas of work.

Please list any evidence in the boxes below (complaints, satisfaction surveys, focus groups, questionnaires, meetings, email, research interviews etc) of communities or groups having different needs, experiences or attitudes in relation to this policy/guidance/operational activity.

Race	There is no evidence available to suggest that in relation to race there are any different needs, experiences or attitudes in relation to this.
Religion or belief & non-belief	There is no evidence available to suggest that in relation to religion and belief there are any different needs, experiences or attitudes in relation to this.
Disability	Can have a particular impact on disabled employees where there is a particular risk of them not attending for reasons related to their disability. Risk of disciplinary action for recurrent short term absence, or long term absence could lead to dismissal on the ground of capability. Disability related absence is collated separately from non-disability-related absence, as is absence related to the disability of a dependent. At present there are no reported cases of the absence management policy causing significant difficulties for disabled staff members.
Gender	National Absence Statistics show that women and younger employees aged 16-34 were more likely than other groups to take at least one day off sick. Can have a particular impact on pregnant employees where there is a particular risk of them not attending for reasons related to their pregnancy. Risk of disciplinary action for recurrent short term absence, or long term absence could lead to dismissal on the ground of capability. Pregnancy related absence is collated separately from non-disability-related absence. At present there are no reported cases of the absence management policy causing significant difficulties for staff members of any particular gender.
Gender Identity	Consider impact on transsexual and transgender people including bullying, harassment and discrimination issues not least ensuring privacy of data to avoid disclosure of gender history. At present there are no reported cases of the absence management policy causing significant difficulties for staff members of any particular gender identity.
Sexual Orientation	There is no evidence available to suggest that in relation to sexual orientation there are any different needs, experiences or attitudes in relation to this.

Age	<p>National Absence Statistics (LFS) show that women and younger employees aged 16 -34 were more likely than other groups to take at least one day off sick.</p> <p>An analysis of sickness absence in the civil service has shown that:</p> <ul style="list-style-type: none"> • younger staff tended to have more spells of absence whilst older staff tended to have longer spells; • older staff in the lowest grades tended to have the highest absence levels; • young, female, part time lower grade staff tended to have a high level of absence. <p>With the abolition of the default retirement age, there is an increased risk of absence related to age-related issues. At present there are no reported cases of the absence management policy causing significant difficulties for staff members of any particular age.</p>
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2.2 What are the overall trends/patterns in this data?

It is recognised that certain protected characteristics may impact on an individual's absence from work and efforts have been made to ensure that no individual is unfairly discriminated against due to any related factors.

However, it is essential that the Conservatoire can effectively manage sickness absence to the benefit of all.

A range of resources are made available to staff to ensure that all possible support is given to enhance attendance.

Resources include:

- Occupational Health Provider
- Employee Assistance programme
- HR Department
- Conservatoire E+D Officer
- Conservatoire Counsellor and Disability Advisor
- Staff Support Contacts

2.3 Please list the specific equality issues and data gaps that may need to be addressed through consultation and/or further research?

There is a need to consider the potential negative and positive impacts of aspects of the policy such as welfare meetings systems for disabled and pregnant employees.

There is a need to consider if risk of unfair disciplinary sanctions mitigated by wording.

There is a need to consider the reasonableness of dismissing long-term sick employees.

Revisit the Internal Consultation that has been done on the policy – e.g. – referral to the Consultative Forum. It was found that the policy read as recommendations and guidance rather than strict rules – i.e. use of language such as “may” reminded users that the policy was to be applied on a case-by-case basis.

Given the introduction of the default retirement age, need to consider whether the health problems typically experienced by older employees put them at particular risk of recurrent short-term absence.

3 INVOLVING AND CONSULTING STAKEHOLDERS

In this section, describe the data you have gathered through stakeholder involvement and engagement.

3.1 Internal consultation and involvement:

(e.g. with other Departments, Staff (including support groups), Students etc)

This policy was tabled with the Consultative Forum, for comment – the general principles were discussed in September 2012 and then a draft version of the policy was discussed in October 2012.

Following queries from staff and the HR team, changes were made to the wording in certain places to make sure that it was clear.

The completion of Return to Work paperwork will make it easier for the HR team to review why employees may have called in sick, behaviours as well as illnesses, so that it is easier to understand why some groups may call in sick more regularly than others.

Work is being done to decide upon how best to monitor absence levels.

As line managers must consult with the HR team before issuing disciplinary sanctions, this will flag to HR where employees have high absence levels and enable them to identify trends.

Feedback what you plan to do as a result of this internal consultation and use it as a basis for work on external consultation.

3.2 External consultation and involvement:

(Strand-specific organisations e.g. charities, local community groups, third sector)

Equality and Human Rights Commission “Top Tips for Employers” recommend accommodating absence as a change that can be made to the workplace to accommodate disabled employees, including informally asking team members how they are and whether they have what they need - especially when people start work in a new role or return to work after a leave of absence. This policy disregards records absence related to a disability separately – meaning no risk of being penalised for recurrent short term absence related to the disability – return to work meeting also allows the employer to ask questions related to absence with a view to implementing reasonable adjustments, facilitating return to full duties and positioning whether the employee is comfortable disclosing their condition to others.

The potential for sex discrimination relates to the protected characteristic of pregnancy and maternity. Different treatment may only be permitted if it is absolutely necessary to do what health and safety law says to protect women who are pregnant or who have recently given birth – this would be covered by the provision that pregnancy records are kept separate from standard absence records as to sanction a woman for absence that is related to her pregnancy and maternity would be potentially discriminatory.

Age Concern UK outlines common age-related illness as:

- Age-related Cataracts
- Age-related Macular Degeneration
- Cancer
- COPD
- Coronary Heart Disease
- Dementia
- Diabetes
- Depression
- Foot problems
- Glaucoma
- Hearing
- High Blood Pressure
- Incontinence
- Influenza
- Insomnia
- Osteoarthritis
- Parkinson's Disease
- Stroke

Many of the conditions outlined can be classed as disabilities for the purpose of the absence policy and would be covered by the need to separate disability related absence from general absence records. The remainder are largely illnesses which could be described as chronic, and therefore the recommendation that allowances be made for underlying health conditions.

The Equality Challenge Unit's "Guide for HR staff, managers and staff supporting students: Supporting a student or member of staff who is transitioning" advised on best practice for working with employees/students undergoing a change from one gender to another and notes that the ECU does not recommend asking for a doctor's letter as evidence of intent to transition but also makes reference to developing an action plan with an employee who is making a transition to consider any necessary arrangements for time off. The policy makes reference to an "underling reason" as opposed to an "underlying medical condition" when disregarding recurrent short term absences for the purpose of disciplinary action, and a GP's letter is only suggested as one way of way of evidencing this. It is therefore suggested that the absence management policy is equipped to avoid discrimination on the ground of gender identity, but that other Equality and Diversity initiatives would be beneficial to make sure there is a holistic, positive approach taken to transitioning staff members.

ASSESSING IMPACT

In this section please record your assessment and analysis of the evidence. This is a key element of the EIA process as it explains how you reached your conclusions, decided on priorities, identified actions and any necessary mitigation.

4.1 Assessment of the impact

In general the terms of the policy mean that there are allowances made to reduce potential for indirect discrimination

The Return to Work interview allows to open a dialogue about absence to put in place appropriate measures to mitigate the impact on employees with protected characteristics such as disability, pregnancy, transitioning to another gender etc.

To further mitigate the risk of indirect discrimination against any particular groups, it is suggested that HR work closely with line managers who are working with the Absence Policy to make sure any potential for indirect discrimination are recognised and addressed, both in delivering training and coaching on individual cases.

Monitoring of absence levels and reasons is recommended to identify and act on trends that might impact on equality and diversity.

Now complete the EIA Action Plan.

5 ACTION PLANNING AND SIGN OFF

5.1 Sign-off

Now submit your EIA and related evidence for clearance.

Date of completion of EIA	April 2013
Compiled by	Julia Murphy, HR Advisor
Senior Manager sign-off	Jackie Russell, Director of HR
Date to Equality + Diversity Officer	April 2013
Date of publication of EIA Report	April 2013
Review date	April 2014

5.3 Publication and Review

Ensure that the EIA including the Action Plan are published alongside your policy/guidance/operational activity.

IMPORTANT - Review, revise and update annually!

ANNEX B - Example Action Plan for use with Equality Impact Assessments

TITLE (E.g. Consolidation of South East Estate Equality Impact Assessment Report - January 2010)

ACTION / ACTIVITY	OWNER AND INTERESTED STAKEHOLDERS	DEPENDENCIES / RISKS / CONSTRAINTS	COMPLETION DATE	PROGRESS UPDATE
Training to be delivered to line managers on implementation of the absence policy.	Line managers HR team	Adequate planning so delivery is effective and there is line management buy-in	September 2013	On-going
On-going consultation between line managers and HR where there is potential for discrimination based on protected characteristics	HR Line Managers	On-going communication between line management and HR where disciplinary sanctions are being issued	On-going	On-going
Identification of KPIs in the area of absence management	HR Line Managers	Limited to reporting capabilities of existing software.	June 2013	Currently consulting with Finance team to identify best way to present this.
Further to identification of KPIs – quarterly reports to be drawn up focusing on absence	E+D Officer HR Manager Staff Consultative Forum E+D Forum	RC to identify information required and supply detail to LD, who will arrange for the data to be produced and supplied on a regular basis	December 2013 for submission of initial reports	Dependent on sufficient identification of overall KPIs

specifically to identify any impact on protected groups				