



Castlereagh Borough Council

Equality Impact Assessment of:

Equal Opportunities Policy
Flexible Working Hours Scheme
Special Leave Policies

CONSULTATION DOCUMENT

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Consultation

Please submit all comments on this report to Samantha Rea at the above address. Comments will be accepted in any format.

The closing date for receipt of comments is **31st December 2008.**

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Executive Summary

In accordance with its Equality Scheme and the Equality Commission Guidance, Castlereagh Borough Council is carrying out an Equality Impact Assessment (EQIA) of three policies –

- Equal Opportunities
- Flexible Working Hours
- Special Leave.

An analysis of the Council workforce shows that, in relation to community background, the Council compares favourably with the percentages of the economically active population of the Borough (as recorded in the 2001 Census), however the Council has a slightly higher proportion of employees from a Protestant community background when compared with the 'travel to work area' for Belfast. The remaining percentages are close to the NI averages, albeit there is a high percentage of older people, especially in the 60+ age band.

The Flexible Working Hours Scheme applies mainly to office based staff and, at present, there are approximately 33% of staff covered by the scheme including a fairly high percentage of females and a low percentage of younger people.

Generally the Council believes that all the policies under consideration are in line with best practice and significantly enhance the ability to promote equality of opportunity. However, equal opportunities initiatives generally have a greater impact on people in groups which are in the minority in the workforce and there is therefore potential for differential impacts.

The Council has no reason to believe that any of the policies has caused actual adverse differential impacts; for example, there have been no complaints under the equal opportunities policy in recent years. However, there is potential for differential impacts for the following Section 75 groups –

- people from a Roman Catholic community background;
- people of non-white ethnic origin;
- younger people (aged under 30);
- people who are unmarried but live in an enduring family relationship with a partner of the same or a different sex (there are potential adverse impacts because of the wording of the current policy on bereavement leave).

In order to address any potential adverse differential impacts and to better promote equality of opportunity the Council will consider the following actions (subject to the comments made during the consultation phase) –

- revising the policies to ensure that all Section 75 groups have equal access to benefits;
- exploring the feasibility of extending the Flexible Working Hours scheme or introducing other forms of flexible working;
- reviewing the content and frequency of equal opportunities training;
- offering to provide all internal communications in alternative accessible formats;
- extending the current equal opportunities monitoring system.

This report has been written primarily to provide information to consultees. Consultation will be carried out in accordance with the Equality Scheme and Equality Commission Guidance and will include a staff survey. When the 2 month consultation period has closed, a final EQIA report will be prepared for the Council's consideration, taking full account of all the responses received. The Council's decision will be incorporated into the final EQIA report which will be published. Thereafter the Council will monitor the impact of the policies to identify any further adverse differential impacts and will publish the results of the monitoring.

Introduction

Section 75

Under Section 75 of the Northern Ireland Act 1998 Castlereagh Borough Council is required **to have due regard to the need to promote equality of opportunity –**

- between persons of different
 - religious belief
 - political opinion
 - racial group
 - age
 - marital status
 - sexual orientation
- between men and women generally
- between persons with a disability and persons without and
- between persons with dependants and persons without.

Without prejudice to the obligations set out above, the Council is also required **to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinion or racial group.**

Schedule 9 of the Act sets out the detailed procedure for the implementation of this duty including the publication of an Equality Scheme and the conduct of Equality Impact Assessments (EQIA) of selected policies. In response to the Act, the Council prepared an Equality Scheme which was approved by the Equality Commission in January 2002.

Screening

The Equality Scheme includes a commitment to applying a systematic process known as “screening” to all new policies to determine whether they are likely to have significant implications for equality of opportunity. If the

conclusion reached at the end of the screening process is that the policy has (or is likely to have) a significant impact on equality of opportunity, then the Council may decide to undertake an Equality Impact Assessment (EQIA). This is a thorough review of a policy, including consultation with everyone affected by it, which can result in suggestions for change.

In accordance with the Equality Scheme, the Council screened the policies on Equal Opportunities, Flexible Working Hours and Special Leave and it was determined that EQIA should be undertaken.

The EQIA process

When undertaking an EQIA, the Council closely follows the Guidance published by the Equality Commission in April 2001 (revised December 2004). This recommends that there should be seven steps in the EQIA process :

- Step 1 : Definition of the aims of the policy
- Step 2 : Consideration of available data and research
- Step 3 : Assessment of potential and actual impacts
- Step 4 : Consideration of measures
- Step 5 : Formal consultation
- Step 6 : Decision and publication of the results of the EQIA
- Step 7 : Monitoring for adverse impact.

This report has been written primarily to provide information to consultees during the formal consultation phase and includes the findings of the first 4 steps of the process. The action to be taken under the remaining 3 steps is also outlined in the report.

1. Definition of the aims of the policies

1.1 Equal Opportunities

The Equal Opportunities Policy is designed to communicate the commitment of the Elected Members, Chief Executive and Senior Management Team to the promotion of equality of opportunity. It contains clear statements of the Council's opposition to all forms of unlawful or unfair discrimination and the intention to select people for employment, promotion, training or any other benefits on the basis of aptitude and ability.

The policy contains a number of measures to ensure effective implementation including –

- communication to all employees;
- appropriate and regular training;
- consultation with Trade Unions;
- an information system to assist in evaluating the effectiveness of the policy;
- the provision of adequate resources;
- a system for monitoring and review of the policy.

In addition the policy provides for the development of an equal opportunities programme to include a range of initiatives and reasonable adjustments, indicating, where appropriate, affirmative/positive action.

The Council's Equal Opportunities Policy is closely based on the model policy issued by the Local Government Staff Commission (LGSC), which in turn reflects best practice as advocated by the Equality Commission. The LGSC last updated the model policy in 2004, but the Equality Commission published a revised model policy in March 2007. As part of this EQIA, the Council intends to make minor revisions to the policy to bring it into line with the Equality Commission's model.

Within the Council, the Human Resources Manager takes responsibility for the implementation of the policy but all managers and supervisory staff play a role in ensuring that the policy is effective. The policy is backed up by agreed procedures for the making and handling of complaints of discrimination. All staff and job applicants are affected by the policy.

1.2 Flexible Working Hours

The Flexible Working Hours Scheme is designed to provide a more flexible system of work attendance for the benefit of employees and to ensure a better service to the public (for example, through the staffing of offices over the lunch-time period). It applies to all staff, where deemed appropriate by management, including both permanent and temporary employees.

There are a number of exemptions where the scheme cannot be applied owing to operational requirements, where hours of work are set for a reason. In addition, there is a minimum number of employees who must be in attendance in each section throughout normal office hours. To ensure the widest possible application, the flexible working hours scheme operates in a modified form for some posts.

The scheme includes core periods between 10am to 12 noon and 2pm to 4pm. Outside of these periods employees may work between 8am and 6pm. Up to 11 credit or debit hours may be carried forward to the following month and employees can take up to 1 ½ days flexi leave per month.

The scheme contains special arrangements for employees to be absent during core hours on account of unforeseen exceptional circumstances, such as urgent domestic/caring responsibilities.

It should be noted that the Council also has in place policies on Time Off In Lieu and Job Share which allow a degree of flexible working. The Time Off In Lieu scheme applies to employees at Senior or Principal Officer level who receive time off on an hour for hour basis for authorised hours worked after

6pm and in excess of their weekly contractual hours. The Job Share policy allows any member of staff who is employed in a full time, permanent capacity and who has completed at least one year's service, to apply to work reduced hours on a job sharing basis.

1.3 Special Leave

Special leave refers to all absences from work other than sickness absence or approved annual leave. The Council does not have a single special leave policy but instead has in place a number of agreements regulating the leave (both paid and unpaid) which can be taken in certain circumstances, for example –

Bereavement

Up to 3 days' paid leave may be granted to an officer on the occasion of the death of a husband, wife, child, parent, brother or sister or any other relative who is a member of the officer's immediate household, or where the officer is solely responsible for funeral arrangements.

Maternity

The Council recognises the right to –

- paid time off for antenatal care;
- maternity leave;
- statutory and occupational maternity pay;
- extended maternity leave;
- return to work after maternity leave.

Paternity

Paid paternity leave may be granted to enable employees to care for a new baby or support the mother of the baby. An employee is eligible for paternity leave and pay if they –

- have or expect to have responsibility for the child's upbringing;
 - are the biological father of the child or the mother's husband or partner;
-

- have worked continuously for the Council for 26 weeks ending with the 15th week before the baby is due.

It should be noted that 'partner' is defined as someone who lives with the mother of the baby in an enduring family relationship but is not an immediate relative. This means that a partner may be a female in a same sex couple.

Jury service

Employees are entitled to paid time off if they are required to perform jury service.

Trade Union duties

The Council recognises two Trade Unions (T&GWU and NIPSA) and allows reasonable time off for employees who are accredited representatives of those unions to carry out union business or attend relevant training.

Competing in international sporting events

Special paid leave may be granted to employees to travel to and compete in international sporting events provided their Director can confirm that the staff member can be released from post, taking operational considerations into account.

Training, study and examination leave

Employees receive time off to attend training/courses approved by the Council if the course takes place during working hours. They are also allowed time off to take examinations and one day study leave per examination.

Compassionate leave for family circumstances

Whilst there is no formal policy, custom and practice prevails that, taking operational considerations into account, employees may receive time off (possibly up to six weeks) to assist them in addressing family circumstances that arise unexpectedly.

2. Consideration of available data and research

2.1 Council data

2.1.1 Total workforce

The Equal Opportunities policy and the rules on Special Leave apply to all Council employees. The Council monitors all applicants for posts in terms of community background, gender, age, disability, racial group and marital status, although the latter two categories were added after the adoption of the Equality Scheme and so this information is not available in respect of all staff.

The latest figures (as at 31 March 2007) show the composition of the workforce as follows, compared with the Northern Ireland economically active population –

		Castlereagh	NI
Community background	Protestant	79.3%	55.7%
	Roman Catholic	9.0%	41.5%
	Non-determined	11.7%	0.4%
Gender	Male	55.3%	56.2%
	Female	44.7%	43.8%
Age	<20	0.3%	6.6%
	20-29	22.8%	24.7%
	30-39	24.6%	27.9%
	40-49	30.8%	22.9%
	50-59	16.9%	15.8%
	60+	4.3%	2.1%
Disability	Disabled	0.9%	6.4%
	Not disabled	99.1%	93.6%
Racial group	White	99.7%	99.3%
	Indian	0.3%	0.7%
Marital status	Single	42.4%	36.7%
	Married	47.0%	58.0%
	Separated/divorced	10.6%	5.3%

It should be noted that the data on marital status relates to approximately 37% of the Council workforce and so this information must be treated with caution. Data on the remainder of the workforce is not available. The Council does not monitor applicants by political opinion, sexual orientation or whether they have/do not have dependants.

In comparison with the percentages of the economically active population of Northern Ireland (as recorded in the 2001 Census), the Council has a high proportion of employees from a Protestant community background. The remaining percentages are close to the NI averages.

2.1.2 Employees covered by flexible working hours scheme

The Flexible Working Hours scheme applies principally to office based staff and, as at 31 March 2007, only 33.2% of staff were eligible to take advantage of the scheme. This percentage can be broken down by community background, gender, age and disability as follows.

		Total workforce	Within the scheme
Community background	Protestant	79.3%	81.0%
	Roman Catholic	9.0%	9.5%
	Non-determined	11.7%	9.5%
Gender	Male	55.3%	38%
	Female	44.7%	62%
Age	<20	0.3%	0%
	20-29	22.8%	27.8%
	30-39	24.6%	25.0%
	40-49	30.8%	24.1%
	50-59	16.9%	19.4%
	60+	4.3%	3.7%
Disability	Disabled	0.9%	0%
	Not disabled	99.1%	100%

Despite the small numbers there is a reasonable correlation to the overall workforce, although there is a substantially higher percentage of females within the scheme.

2.2 Published research

For the purposes of this EQIA the Council has conducted desk research into published reports relating to equality of opportunity in employment and equality assessments of policies relating to equal opportunities, flexible working and special leave. Whilst not all the findings of the published reports will be applicable to the Council, the research suggests appropriate actions which the Council might take to further promote equality of opportunity in the context of these policies.

2.2.1 Key equality statistics relating to employment

In November 2005 the OFMDFM published a report considering labour market dynamics in which they noted improvements in relation to fair employment (between people from different community backgrounds) but marked and persistent inequalities in relation to gender and disability.

In October 2007 the Equality Commission published a statement on key inequalities in Northern Ireland which highlighted the issues around gender and disability in employment. In respect of gender, the report showed that –

- differences in occupational profiles remains an issue with 32.1% of males employed in the higher ‘managerial’ groups compared with 27.0% of women (the figures are from the Equality Commission monitoring report published 2006);
- the unequal sharing of care responsibilities means that of those females who are economically inactive, 45% are unavailable for work owing to family or home commitments;

- there is emerging evidence of high job exit rates among lone parents, the majority of whom are women.

In respect of disability, the report showed that labour market outcomes for people with work-limiting disabilities are significantly worse than for other people, with the employment rate for people without disabilities being 79% compared with 32% for disabled people. The key barriers impacting on access to employment for disabled people include lower educational achievements, the attitude of employers and access to transport.

These findings illustrate the importance of the promotion of equality of opportunity in the workplace and the significant contribution which work-life balance policies (including flexible working) can bring in terms of increasing access to and progression in employment for people in under represented categories.

2.2.2 Equal Opportunities policies

Several public authorities have carried out EQIA of equal opportunity policies in recent years and published the findings on their websites. Many of these authorities have combined their recruitment and selection process with their equal opportunities policies and therefore the majority of the findings relate to recruitment issues. However, there are also some general points relevant to this EQIA which are summarised below. In developing this summary, particular attention was paid to EQIA carried out by organisations representing a range of public authorities, including those conducted by the LGSC and the Association of Northern Ireland Colleges (ANIC). The key points are –

- equal opportunity monitoring forms should request information on as many of the Section 75 categories as possible;
- employee surveys should be conducted to obtain additional monitoring information on current employees;

- staff should receive regular refresher training on equal opportunities.

The LGSC provided information on a workshop conducted by local councils at the time when they were screening their policies. This was attended by a wide range of organisations representing people in various Section 75 groups and some of them made comments on recruitment practices which are relevant to this EQIA as follows –

Disability Action

- Disabled people are significantly under-represented within the workforce, particularly in many local authorities. Local authorities should review their current practices to measure adverse impact and to ensure positive steps are taken to remove or mitigate disadvantage.

Royal National Institute for the Deaf

- Procedures relating to recruitment and access to information must specifically address the needs of deaf and hard of hearing people.

Age Sector Reference Group

- Ageism should be an essential ingredient in all staff training.

Northern Ireland Council for Ethnic Minorities

- All aspects of (personnel) policies potentially affect ethnic minority individuals or groups. Especially important is the commitment to increase the numbers of staff from under-represented black and minority ethnic groups at all levels of the organisation.

Chinese Welfare Association

- Specific staff training focusing on how the recent legislative initiatives concerning race relations affect their work would be a progressive step towards broadening perspectives.

MENCAP

- Perceived barriers for working parents who have a child with a learning disability include long hours of work, the lack of flexibility at work, the lack of appropriate child care, the terminology of job advertisements and the attitudes of managers when in post.

2.2.3 Flexible working and special leave

In recent years a large number of local councils across the UK have published the results of screening and equality impact assessment of approaches to flexible working. Without exception they have all concluded that flexible working policies have a positive impact on the promotion of equality of opportunity, especially for women, disabled people and people with dependants. Flexible working provides work opportunities to people in these groups which they might not otherwise be able to access.

In Northern Ireland there are two reports which are of particular relevance to this EQIA.

(a) Health and social services agencies

A group of health and social services agencies conducted a comprehensive EQIA of their flexible working policies in 2003. A range of policies was assessed, including part-time work, job-sharing, flexi-time, annualised hours, personalised hours, compressed hours, term time working, career breaks and carers' leave. One of the key findings of the EQIA was in respect of participation by male employees. The quantitative analysis showed that men were clearly underrepresented in terms of schemes where employees were required to make applications (eg. carers' leave). Additional qualitative data

suggested that this was not due to adverse impacts of the policies themselves but rather due to cultural issues, such as traditional gender roles and misconceptions about eligibility to apply. Also, there were indications that some line managers were not fully aware of the eligibility rules in respect of certain schemes and the policies might therefore not be applied consistently.

The main recommendation was therefore that initiatives should be introduced to raise awareness of flexible working policies across the organisations and that line managers should be trained to ensure that the policies were applied consistently.

(b) Translink

Translink consulted on an EQIA report on their Bereavement and Special Leave Policy in 2007. The policy allows bereavement leave up to a maximum of three days to an employee on the occasion of the death of a husband, wife, partner (partner includes same-sex relationships), mother, father, brother, sister, son or daughter. In addition, bereavement leave up to a maximum of two days may be granted to an employee on the occasion of the death of the employee's mother-in-law or father-in-law, where they were a resident member of the household. Translink identified that the latter provision was only available to those who are married and did not reflect the fact that the mother or father of an employee's partner may be resident in the household. Translink undertook to revise the policy to remove this anomaly.

3. Assessment of actual and potential impacts

The aim of this EQIA is to identify aspects of the policies which have a differential impact on some people because they belong to a particular group within the Section 75 categories. Where the differential impact is potentially adverse, the Council will seek to revise its policies or take mitigating action to eliminate or substantially reduce the adverse impacts. The Council will also seek to identify opportunities to further promote equality of opportunity.

This section of the report therefore brings together the information from the data analysis and research cited above and identifies the impacts on the various groups under the Section 75 categories. However, it is acknowledged that there are some gaps in terms of both quantitative and qualitative data and attempts will be made to seek further information during the consultation process (see section 5 below for further details).

Generally the Council believes that all the policies under consideration are in line with best practice and significantly enhance the ability to promote equality of opportunity. However, equal opportunities initiatives generally have a greater impact on people in groups which are in the minority in the workforce and there is therefore potential for differential impacts.

The Council has no reason to believe that any of the policies has caused actual adverse differential impacts; for example, there have been no complaints under the equal opportunities policy in recent years. Again, the consultation process may provide additional evidence.

The following paragraphs therefore identify the potential differential impacts which might arise under the policies in future and which require some form of action. The obvious beneficial differential impacts which do not require action – for example, that maternity leave benefits women and paternity leave is mainly of benefit to men – have not been included.

3.1 Religious belief/political opinion

There is a relatively small percentage of people from a Roman Catholic community background within the Council workforce (9.0% compared with 41.5% of the economically active population of Northern Ireland). The Council does not monitor the political opinion of its employees but it is assumed that there will be a high correlation between community background and political opinion and that, therefore, there is also a relatively small percentage of Nationalists within the workforce.

Although there is no specific evidence of actual adverse impacts, there is potential for the people within these minority groups to have greater need of the protection of the equal opportunities policy.

It is not considered that the flexible working hours and special leave policies would have any differential impact on people of different religious belief or political opinion.

3.2 Race

There is a very small percentage of people from a non-white ethnic origin within the Council workforce; only one employee within the Council is of non-white ethnic origin. As with community background, there is no specific evidence of actual adverse impact, but there is potential for people of non-white ethnic origin to have greater need of the protection of the equal opportunities policy.

It is not considered that the flexible working hours and special leave policies would have any differential impact on people of different racial groups.

The Council acknowledges the suggestions of the Chinese Welfare Association regarding staff training on the effect of recent race relations legislation on employment to broaden perspectives.

3.3 Age

There is a relatively small percentage of younger people within the Council workforce (23.1% are aged under 30 compared with 31.2% of the economically active population of Northern Ireland). Again there is no specific evidence of adverse differential impact in terms of equality of opportunity but the potential for such impacts cannot be dismissed.

With respect to the flexible hours scheme, it appears that 27.8% of people aged under 30 participate in the scheme. This is explained by the fact that some of the posts excluded from the scheme (for example, recreation assistants) tend to attract younger people. The extent to which younger staff perceive this to be adverse will be explored during the consultation phase.

It is not considered that the special leave policies have any differential impact on people of different ages.

The Council acknowledges the suggestion of the Age Sector Reference Group that ageism should be an essential ingredient in staff training.

3.4 Marital status

The Council currently holds monitoring information on the marital status of only 37% of the workforce so it is difficult to assess whether any particular group is in a minority and might be affected differentially by the equal opportunities policy. The Council is not aware of any problems which have arisen in respect of marital status.

However, the Translink EQIA identified a potential adverse differential impact of bereavement policies on people who are not married. At present the Council policy requires that the bereaved officer be a relative in order for bereavement leave to apply (except where the officer is solely responsible for funeral arrangements). There is an anomaly in respect of unmarried partners and their relatives who are members of the household. In this context it

should be noted that the Council's policy on paternity leave makes specific mention of partners.

It is not considered that the flexible hours scheme would have any differential impact on people of different marital status.

3.5 Sexual orientation

The Council does not monitor the sexual orientation of employees and so no quantitative data is available; however, qualitative evidence may be obtained during the consultation phase.

With regard to bereavement leave, the issue noted above under marital status may have an adverse differential impact on people in same sex relationships. It should be noted, however, that the Council's policy on paternity leave makes explicit provision for females in same sex relationships.

It is not considered that the flexible hours scheme would have any differential impact on people of different sexual orientation.

3.6 Gender

The Council's workforce very closely reflects the gender split within the economically active population of Northern Ireland. However, it appears that more women benefit from the flexible working hours scheme than men, owing to the fact that women are in the majority in office based posts. The extent to which male staff perceive this differential impact to be adverse will be explored during the consultation phase.

The Council also acknowledges the findings of the health and social services agencies that men may be less likely to apply for special leave than women.

3.7 Disability

The Equality Commission data shows that labour market outcomes for people with work-limiting disabilities are significantly worse than for other people. However, the Equality Commission attributes this mainly to the difficulties which disabled people face in obtaining employment. There is a relatively small percentage of disabled people within the Council workforce (0.9% compared with 6.4% of the economically active population of Northern Ireland). Although there is no specific evidence of actual adverse impacts, there is potential for disabled people to have greater need of the protection of the equal opportunities policy.

The findings of earlier EQIA show that flexible working hours may be of particular benefit to disabled people but none of the Council's disabled employees are currently within the remit of the scheme.

It is not considered that the special leave policies would have any differential impact on disabled people.

The comments by the RNID that access to information must specifically address the needs of disabled people are acknowledged.

3.8 Dependants

The Council does not monitor employees in terms of whether they have or do not have dependants and so no quantitative data is available; however, qualitative evidence may be obtained during the consultation phase. This could be particularly relevant in terms of flexible working and special leave which may be of particular benefit to people with caring responsibilities.

4. Consideration of measures

Having identified the potential differential impacts of the policies, the EQIA process requires that the Council should consider alternative policies and opportunities to better achieve the promotion of equality of opportunity and measures which might mitigate any adverse impact. The following actions have been identified from the assessment undertaken to date, but consideration will be given to further actions suggested as a result of the consultation process.

4.1 Revisions to the policies

4.1.1 *Equal Opportunities*

As the policy has not been updated since 2004, it is proposed that it should be revised to include the following elements –

- extend the categories listed in the statement of policy to include civil partnership status and national origin;
- extend the scope of the policy so that it applies to all who work for (or apply to work for) the Council including those who do not have an employment contract, for example, volunteer workers.

These revisions would bring the policy in line with the Model Policy published by the Equality Commission in 2007.

4.1.2 *Flexible working*

No specific changes to the policy are recommended but the Council would consider evaluating the feasibility of extending the scheme to other posts should the consultation show that there is a high level of perceived need among staff who do not currently benefit from it. The Council might also consider the potential for introducing other forms of flexible working (for example, term time or compressed hours) which might further promote

equality of opportunity. However, any extension of the current scheme would have to take account of operational needs.

4.1.3 Special leave

It is proposed that the policy on bereavement leave should be revised to make it clear that it is available to people in enduring relationships who are not legally related and applies on the occasion of the death of a partner's relative where that person was a member of the household.

4.2 Training

It is proposed that the content and frequency of equal opportunities training should be reviewed to ensure that all staff and managers receive appropriate training on a regular basis (including induction training). The training should ensure that –

- all employees are aware of their responsibilities and the benefits to which they are entitled;
- all managers are aware of the scope of equal opportunities, flexible working and special leave schemes so that these are applied consistently;
- opportunities to broaden perspectives are maximised, particularly in respect of race relations, ageism and disability.

If the consultation shows that staff are not particularly aware of the flexible working and special leave schemes, the Council might also consider issuing some form of bulletin or update.

4.3 Communication and access to information

Although the Council has monitoring data on disabled people and is therefore aware of any specific needs that they might have in terms of communication, it would be good practice to offer to provide all internal communications in

alternative accessible formats. A standard sentence could be added to all internal written communications.

4.4 Monitoring

The Council currently monitors applicants for posts in relation to community background, racial group, age, marital status, gender and disability.

Consideration may be given to including a question on whether a person has or does not have dependants in future monitoring questionnaires. In addition, the Council might consider asking current employees who completed a simpler monitoring questionnaire when they applied for their posts to provide additional information on the newer categories. This would provide improved data for future reviews of employee policies and also allow for the monitoring of the findings of this EQIA.

5. Consultation

5.1 Equality Scheme consultees

Consultation on this report will be carried out in accordance with the Council's Equality Scheme. The Scheme sets out the Council's commitment to the following principles :

- consultation will be carried out in accordance with the Equality Commission Guiding Principles;
- consultation with groups and individuals will begin as early as possible;
- there will be different means of consultation for different groups;
- information will be made available to ensure meaningful consultation.

A letter summarising the findings of the EQIA to date will be circulated to all the organisations and individuals on the Council's consultation list; this list was set out in the Equality Scheme and has been updated on a regular basis. The letter will make it clear that a copy of the full EQIA report can be found on the Council's website and that alternative formats (such as Braille, large print, disk and audiocassette and minority languages) will be made available on a timely basis on request. The letter will invite consultees to comment in writing, by e mail, by telephone or at specially arranged meetings with appropriate officers.

5.2 Staff

The key people affected by the policies are all employees of the Council and particular attention will therefore be given to consulting line managers. Staff will be informed about the findings of the EQIA to date (using the Council's usual communication channels) and provided with access to the EQIA report. A questionnaire will also be circulated inviting line managers to comment on –

- their awareness of the policies;
- their perception of the effects of differentials in terms of Section 75 groups within the workforce;
- whether they have ever experienced any problems in respect of equal opportunities;
- whether they would like to participate in some form of flexible working scheme and how they might benefit from it;
- how easy they find it to apply for special leave;
- their general comments on the policies.

Responses to the questionnaire will be confidential and the report of the findings will not identify any individuals.

5.3 Consultation period

The Council recognises the importance of allowing adequate time for consultation and on this occasion will provide a period of response of two months.

5.4 Results of the consultation

All responses received will be taken into account when decisions are being made. A report of the consultation process will be prepared setting out the comments received and the proposed response. The EQIA report will also be amended to take account of the points made.

6. Decision and publication of the results of the EQIA

At the end of the consultation period the Council will prepare a revised version of this EQIA report amended as a result of the comments received and including a full report of the consultation process.

This report will be evaluated and recommendations will be made to the Council. The Council's decision will be incorporated into a final EQIA report which will set out the consideration given to the impact of alternative policies and mitigating actions.

The final EQIA report will be made available through the Council's website, press releases and public notices. If requested, the Council will produce the report in Braille, on disk and to meet the needs of those who are not fluent in English.

Information will also be made available to publications and media associated with the section 75 categories.

7. Monitoring for adverse impact

The final EQIA report will specify the arrangements for monitoring the impact of the policy and how the results of the monitoring will be published.

If the monitoring shows that any of the policies results in greater adverse impact than predicted, further consideration will be given to the way in which the policy is implemented and any additional mitigating actions which can be taken. Similarly if opportunities arise which would allow for greater equality of opportunity to be promoted, each policy will be reconsidered. The results of the monitoring will be evaluated on an annual basis and will be published annually.