



Glasgow Kelvin College

Equality Impact Assessment

Attendance Management and Support Policy and
Procedure

2019

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Title of Policy, Procedure or Practice: Attendance Management and Support Policy and Procedure

Type of Policy, Procedure or Practice: New Existing, Reviewed or Revised

Team Leading Impact Assessment: Human Resources

Lead Person: D Shiels

Date of Assessment: June 2019 – October 2019

Aims and Outcomes

What are the intended aims / outcomes of the policy, procedure or practice? Who is the target audience and who is it intended to benefit?

Policy which provides the overarching principles of the approach taken by the College to managing attendance, supporting those with ill health, physical or mental, and a procedure for ensuring reasonable adjustments are made at an early stage. Target audience and benefits are for staff.

Evidence and Information

What information has been used as the basis for this EIA?

Equality Act 2010 - legislation;
 EHRC Code of Practice on Employment;
 Equality Act 2010: Duty on employer to make reasonable adjustments for their staff;
 ACAS - Absence Management; Managing Staff Absence and Advice and Guidance on Disability Discrimination;
 CIPD – Absence Management Survey Reports and recommended best practice;
 MIND/CIPD -Managing and Supporting Mental Health at Work:
 Case law and case studies;
 NHS - Supporting Staff who are experiencing mental health problems;
 TUC -Sickness Absence and Disability Discrimination;
 HSE - Working together to prevent sickness absence becoming job loss; Absence Management Toolkit; and Managing Sickness Absence and Return to Work; and
 XpertHR.
 Menopause guides and reports

Which individuals, groups or organisations representing protected characteristics have been involved in the undertaking of this assessment?

Trade Union representatives - Unison;
 Trade Union representatives – EIS/FELA;
 Managers;
 Staff (focus on staff with a disability or experiencing the menopause);
 College Legal Advisors;
 Health and Safety Manager; and
 Occupational Health
 Short Life Workgroup – staff, Unison and EIS/FELA

What does the information indicate about potential positive, neutral or negative impacts for each protected characteristic?

Protected Characteristics	Potential Impact
Age	<p>The policy applies to all regardless of age.</p> <p>Older employees may have a greater potential for the impact of ill health. The policy provides for reasonable adjustments and a process for early retirement on the grounds of ill health where appropriate.</p>
Disability	<p>The policy applies to all regardless of disability. Policy is available on intranet and therefore available in different fonts, text size and through assisted technology.</p> <p>This policy has a positive impact as it takes into account the Equality Act 2010, which makes it unlawful for employers to discriminate against current or prospective employees with disabilities or because of a reason relating to their disability. The College has a legal obligation to look at reasonable adjustments for employees who have a disability, long-term health condition and experiencing the menopause to enable them to fulfil their role/potential role. Reasonable adjustments will be considered and HR will seek specialist advice and support on reasonable adjustments from external providers such as Occupational Health or the Department of Work and Pensions Access to Work Scheme. A higher level of absence will be acceptable where there are no significant operational difficulties. Time off for treatment or appointments will be provided through the Family Friendly and Flexible Working Policy.</p> <p>The policy provides for reasonable adjustments and a process for early retirement on the grounds of ill health where appropriate.</p>
Gender Reassignment	<p>The policy applies to all regardless of gender reassignment.</p> <p>This Policy has a positive impact as a transsexual person will be fully supported during the process and a higher level of absence will be acceptable where there are no significant operational difficulties. Time off for appointments and counselling will be provided through the Family Friendly and Flexible Working Policy.</p>
Marriage and Civil Partnership	<p>The policy applies to all regardless of marital status.</p>
Pregnancy and Maternity	<p>The policy applies to all regardless if the woman is pregnant or on maternity leave and incorporates reasonable adjustments to support women during and after their pregnancy.</p> <p>The policy will have a positive impact as it takes into account pregnancy and a higher level of sickness absence will be accepted during this period. Time off for appointments will be provided through the Family Friendly and Flexible Working Policy.</p>
Race	<p>The policy applies to all regardless of race.</p>

Religion or Belief	The policy applies to all regardless of religion or belief.
Sex	The policy applies to all regardless of gender and incorporates reasonable adjustments for those experiencing the menopause.
Sexual Orientation	The policy applies to all regardless of sexual orientation.

Are you able to reduce any potential negative impacts identified? If so, how?

Staff with a disability felt that the terminology used in relation to the staged interview process, stage 1, stage 2, stage 3, etc was unhelpful, the wording of the policy was reviewed and the words 'staged interview' removed. This was replaced by the words 'formal meeting'. The ISRA process has been reviewed and will only be applied when OHS advice is required otherwise a more informal approach will be used to resolve work related issues. The policy now considers reasonable adjustments for those experiencing the menopause.

Compliance with General Equality Duty

Does the policy, procedure or practice comply with the three parts of the general duty?

- **Eliminate discrimination, harassment and victimisation and other conduct prohibited by the [Equality Act \(2010\)](#)**
- **Foster good relations between people from different groups - this involves tackling prejudice and promoting understanding between people from different groups**
- **Advance equality of opportunity between people from different groups**

Yes No

If no, what arrangements could be implemented to better comply with the duty?

NA

What is the EIA outcome?

A positive impact is likely A negative impact is not foreseen

A negative impact is likely A negative impact is probable or certain

Are you able to introduce the policy, procedure or practice without changes? Yes No

If no, what changes will you make before implementation?

Training and development will be provided for managers and policy will be promoted to all staff

Action and Monitoring

What action will be taken, by whom and when?

Policy issued to all existing staff to raise awareness.
 Policy issued to all new staff as part of induction process.
 Policy available on the intranet and internet.
 Training for managers.
 Briefings for staff.
 Monitoring and reporting of absence to the Board of Management and HR Committee.
 Employee Assistance Programme – external provider in place.
 Occupational Health advice and Support.
 Promotion activities for early disclosure of disability or ill health.
 Healthy Working Lives.
 Individual Stress Risk Assessment for absence where individuals feel work in having a negative impact.
 Wellbeing Survey every two years
 Phased return to work scheme in place
 Short Life Working Group

Once implemented how the policy will, procedure or practice be monitored?

Monitoring and review part of ongoing process when managing cases
 Statistical data is presented to the SMT, JNC and twice per year at the HR Committee

Signed: Doreen M Shiels

Date: 15.11.19

NB: Finalisation of central monitoring & identification of compound impact will be undertaken within Equalities Management. Please return to the EDI manager for approval by the EDI Committee

Approval –

This document was considered and approved by

Name – Audrey Miller, Vice Principal HR and OD Date – 18 November 2019

Name - Monica McKerlie, Head of Learner Services Date – 19 November 2019

Appendix

Equality Act General Duty requires colleges to have **due regard** to the need to:

1. Eliminate

- a) discrimination,
- b) harassment,
- c) victimization; or
- d) any other prohibited conduct

2. Advance equality of opportunity by

- a) removing or minimising disadvantage
- b) meeting the needs of particular groups that are different from the needs of others
- c) encouraging participation in public life

3. Foster good relations – tackle prejudice, promote understanding

Protected Characteristics:

- 1. Age
- 2. Disability
- 3. Gender Reassignment
- 4. Marriage And Civil Partnership (applies only in relation to (1a) discrimination in *employment*, not to students)
- 5. Pregnancy And Maternity
- 6. Race
- 7. Religion Or Belief
- 8. Sex/ Gender
- 9. Sexual Orientation.