

## Integrated Impact Assessment (IIA)

### Part 1 Scoping

#### 1 Details of the Proposal

<b>Title of Proposal:</b>	Reasonable Adjustments Policy (incorporating supporting guidance for Managers and Employees)
<b>What is it?</b>	A new Policy/Strategy/Practice <input type="checkbox"/> A revised Policy/Strategy/Practice <input checked="" type="checkbox"/>
<b>Description of the proposal:</b> (Set out a clear understanding of the purpose of the proposal being developed or reviewed (what are the aims, objectives and intended outcomes, including the context within which it will operate).	<p>The Council aims to create the conditions in which members of staff and applicants for posts within the Council are treated equitably regardless of any disability or health condition so far as is reasonably possible.</p> <p>This policy clarifies the manner in which the Council will comply with its legal obligation to make reasonable adjustments for employees with a disability where appropriate.</p> <p>In addition the Council is a Disability Confident Employer. A key criterion of the assessment for achieving this accreditation is evidencing our commitment to and knowledge of how to offer and make reasonable adjustments.</p> <p>The purpose of this Policy is to put this into practice for new and existing members of staff who have a disability or health condition which may impact upon their work, or whose work may impact upon their disability. The intention is to create a framework for a collaborative dialogue between the member of staff and their line</p>

	<p>manager (and where appropriate other internal services and/ or specialist external agencies) to ensure that the member of staff can be effectively supported and that the Council can fulfil its statutory obligations.</p> <p>All information disclosed under this policy will be treated confidentially and with sensitivity, being passed on to other colleagues only when this is necessary in order that the Council can appropriately address matters with the employee/ potential employee and meet its obligations under equality, employment and health and safety law.</p>
<b>Service Area:</b> <b>Department:</b>	Human Resources
<b>Lead Officer:</b> (Name and job title)	Iain Davidson Employee Relations Manager
<b>Other Officers/Partners involved:</b> (List names, job titles and organisations)	Simone Doyle HR Equality & Diversity Officer
<b>Date(s) IIA completed:</b>	25 <sup>th</sup> February & 31 <sup>st</sup> March 2020

**2 Will there be any cumulative impacts as a result of the relationship between this proposal and other policies?**

**Yes**

**If yes, - please state here:**

The Policy provides information about general good practice and legislative duties and is to be used in conjunction with the complete range of HR Policies, Procedures and Guidelines. These policies include but are not limited to:

- Attendance Management
- Discipline
- Dignity and Respect in the Workplace
- Equality, Diversity and Human Rights
- Family Friendly
- Flexi Time Scheme
- Flexible Working
- Grievance
- Leave
- Managing Employees with a Disability Guidance (appendix 1 Attendance Management Policy)
- Managing Work Performance
- Mentally Healthy Workplace & Stress Management Policy
- Recruitment and Selection
- Redeployment
- Redundancy
- References
- Training and Development

**3 Legislative Requirements**

**3.1 Relevance to the Equality Duty:**

<p><b>Do you believe your proposal has any relevance under the Equality Act 2010?</b>  <i>(If you believe that your proposal may have some relevance – however small please indicate yes. If there is no effect, please enter “No” and go to Section 3.2.)</i></p>	
<b>Equality Duty</b>	<b>Reasoning:</b>
<p><b>Elimination of discrimination (both direct &amp; indirect), victimisation and harassment.</b> <i>(Will the proposal discriminate? Or help eliminate discrimination?)</i></p>	Raising awareness of and following this Policy serves to meet the equality duty of eliminating discrimination and promoting good relations.
<p><b>Promotion of equality of opportunity?</b>  <i>(Will your proposal help or hinder the Council with this)</i></p>	This Policy should allow promotion of equality of opportunity as it sets out a clear procedure that is applicable to all potential/employees and will assist people with a disability to remain in work or join the workforce..
<p><b>Foster good relations?</b>  <i>(Will your proposal help or hinder the council s relationships with those who have equality characteristics?)</i></p>	While not directly relevant to this part of the Equality Duty, the ethical approach could assist with the fostering of good relations.

<p><b>3.2 Which groups of people do you think will be or potentially could be, impacted by the implementation of this proposal? (You should consider employees, clients, customers / service users, and any other relevant groups)</b></p>				
<p>Please tick below as appropriate, outlining any potential impacts on the undernoted equality groups this proposal may have and how you know this.</p>				
	<p><b>Impact</b></p>			<p><b>Please explain the potential impacts and how you know this</b></p>
	<p><b>No Impact</b></p>	<p><b>Positive Impact</b></p>	<p><b>Negative Impact</b></p>	
<p>All of the protected characteristics including:</p>		<p>X</p>		<p>It is noted that this Policy should positively impact on potential employees who declare a disability as well as</p>

Gender Reassignment, Race, Religion/belief, Sex and Sexual Orientation			<p>employees who have a disability (as defined by the Equality Act 2010) or become disabled whilst in the Council's employ. The Policy defines reasonable adjustments, reinforced by many examples of the type of adjustments that can be made in the workplace. Roles and responsibilities are clearly set out within the Policy.</p> <p>To further assist in the application of the Policy, supporting guidance for both Managers and Employees is appended to the Policy.</p>
Age		x	<p>Workforce data (Jan – Dec 2018) shows that only 9.53% of employees are aged 16 – 29 years, whilst there are 67% of employees aged over 45. Consequently, there is a relatively high amount of older employees.</p> <p>This policy has potentially a positive impact on older employees. Older people are more likely to have a health condition or disability which may require a reasonable adjustment.</p>
Disability		x	<p>In essence this Policy has been formulated to ensure that potential/employees with a disability or long term health condition that affects their day to day activities will not encounter any detrimental treatment whilst employed by the Council. It provides a mechanism to assist people with a disability to remain in work or join the workforce. The Policy clearly sets out ways to mitigate any potential negative impact caused by a disability by making reasonable adjustments thus ensuring that measures are in place to support the employee at work.</p> <p>In addition specific guidance on managing employees with a disability is set out at Appendix 1 of the Attendance Management Policy. This guidance also makes reference to reasonable adjustments where the attendance management procedure is invoked and absence is related to disability.</p>

				Nevertheless, it is noted that only 2.60% of Council employees have declared that they have a disability. Approximately 84% of employees have not provided information about this protected characteristic.
<p><b>3.3 Fairer Scotland Duty</b></p> <p>This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) to how we can reduce inequalities of outcome caused by socioeconomic disadvantage when making <u>strategic</u> decisions.</p> <p>The duty is set at a strategic level - these are the key, high level decisions that SBC will take. This would normally include strategy documents, decisions about setting priorities, allocating resources and commissioning services.</p>				
<p><b>Is the proposal strategic?</b></p> <p>No</p> <p><b>If No go to Section 3.4</b></p> <p>It is deemed that this policy is not relevant to the Fairer Scotland Duty. This assessment is of an internal policy. The purpose of this policy is to set out how the Council aims to create conditions in which members of staff and applicants for posts within the Council are treated equitably regardless of any disability or health condition so far as is reasonably possible. The policy provides a framework for a collaborative dialogue between the member of staff, their line Manager, other internal services staff (and where appropriate specialist external agencies) to ensure that the member of staff can be effectively supported and that the Council can fulfil its statutory obligations.</p>				
<p><b>If yes, please indicate any potential impact on the undernoted groups this proposal may have and how you know this:</b></p>				
	<b>Impact</b>			<b>State here how you know this</b>
	<b>No Impact</b>	<b>Positive Impact</b>	<b>Negative Impact</b>	
<b>Low and/or No Wealth</b> – enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future.				

<b>Material Deprivation</b> – being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies				
<b>Area Deprivation</b> – where you live (e.g. rural areas), where you work (e.g. accessibility of transport)				
<b>Socio-economic Background</b> – social class i.e. parents' education, employment and income				
<b>Looked after and accommodated children and young people</b>				
<b>Carers</b> paid and unpaid including family members				
<b>Homelessness</b>				
<b>Addictions and substance use</b>				
<b>Those involved within the criminal justice system</b>				

#### **4 Full Integrated Impact Assessment Required**

*Select No if you have answered “No” to all of Sections 3.1 – 3.3.*

**No.**

**If a full impact assessment is not required briefly explain why there are no effects and provide justification for the decision.**

The review of this policy has found that the impact of this policy is positive. Awareness and implementation of the policy will greatly reduce the risk of discrimination, harassment or victimisation for all potential and existing employees of SBC. In order to ensure that the policy remains relevant and fit for purpose the policy will be reviewed at least every two years in accordance with the Council's HR Policy Review Programme and the following actions will be undertaken:

- Continued initiatives to encourage employees to declare any disability
- The HR Case Management Team will continue to support Managers with the practical application of the Policy, with specific reference to explaining and advising on the definitions of “Disability” and “Reasonable Adjustments”.

<b>Signed by Lead Officer:</b>	Iain Davidson
<b>Designation:</b>	Employee Relations Manager
<b>Date:</b>	27 <sup>th</sup> February 2020
<b>Counter Signature Service Director</b>	Clair Hepburn
<b>Date:</b>	31 <sup>st</sup> March 2020