

## Equality Impact Analysis

1. Equality Impact Analysis									
<b>Policy / Project / Function:</b>	Dress code policy								
<b>Date of Analysis:</b>	22/4/14								
<b>This Equality Impact Analysis was completed by: (Name and Department)</b>	Workforce service								
<b>What are the aims and intended effects of this policy, project or function ?</b>	<p>The Dress Code Policy is necessary in order to:</p> <ul style="list-style-type: none"> <li>• Present a smart and professional image, thereby increasing patient and public confidence.</li> <li>• Support infection prevention and control</li> <li>• Have regard to health and safety considerations for staff</li> </ul>								
<b>Please list any other policies that are related to or referred to as part of this analysis?</b>	<p>Grievance Policy and Procedure            Disciplinary Policy and Procedure            ACAS Advisory Booklet – The People Factor (June 2011)            ACAS Guide on Religion or Belief and the Workplace            Equality and Diversity Policy            Health and Safety Policy and Procedure            Control of Infection Policy, Procedures and Guidance</p>								
<b>Who does the policy, project or function affect?</b>  Please Tick ✓	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">Employees</td> <td style="text-align: center;">✓</td> </tr> <tr> <td>Service Users</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Members of the Public</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Other (List Below)</td> <td style="text-align: center;">✓ - volunteers</td> </tr> </table>	Employees	✓	Service Users	<input type="checkbox"/>	Members of the Public	<input type="checkbox"/>	Other (List Below)	✓ - volunteers
Employees	✓								
Service Users	<input type="checkbox"/>								
Members of the Public	<input type="checkbox"/>								
Other (List Below)	✓ - volunteers								

## 2. Equality Impact Analysis: Screening

	Could this policy have a positive impact on...		Could this policy have a negative impact on...		Is there any evidence which already exists from previous (e.g. from previous engagement) to evidence this impact
	Yes	No	Yes	No	
<b>Race</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	In para 5.2 the CCG recognises 'the diversity of cultures, religions and disabilities' It also recognises the requirement that all dress should adhere to Health and Safety and Infection Control regulations
<b>Age</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy does not positively or negatively affect groups with this protected characteristic
<b>Sexual Orientation</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy does not positively or negatively affect groups with this protected characteristic
<b>Disabled People</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	'The diversity of cultures, religions and disabilities' is recognised in para 5.2. Some staff may need modifications to the standard uniform for reasons arising from a disability e.g. special footwear. This will be accommodated within the constraints of Health and Safety where possible. It is also recognised that some staff may have specific medical conditions e.g. allergic reactions to materials which will need to be addressed on an individual basis. The policy is designed to take account of individual circumstances
<b>Gender</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy does not positively or negatively affect groups with this protected characteristic
<b>Transgender People</b>	✓	<input type="checkbox"/>	<input type="checkbox"/>	✓	The dress code for any member of staff going through gender reassignment should be dealt with sensitively on an individual basis. The policy is designed to take account of individual circumstances (para 5.2)
<b>Pregnancy and Maternity</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	The policy does not positively or negatively affect groups with this protected characteristic

<b>Marital Status</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The policy does not positively or negatively affect groups with this protected characteristic
<b>Religion and Belief</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>Eweida v British Airways Plc</i> - a dress code is justified if there is a genuine and important reason for it and the discriminatory impact of the policy has been assessed. It is also a requirement that it is applied consistently. In para 5.2 the CCG recognises 'the diversity of cultures, religions and disabilities' It also recognises the requirement that all dress should adhere to Health and Safety and Infection Control regulations (see also reasoning below)
<b>Reasoning</b>	<p>Health and Safety at Work Act 1979 (and, as amended, 1999)</p> <p>The Health and Social Care Act (2008) contains a code of practice on the prevention and control of health care associated infections (HCAI) and related guidance. The code states that uniform and dress codes ensure that clothing worn by staff when carrying out their duties is clean and fit for purpose. Organisations are also required to ensure that policies enable good hand hygiene practices</p>				
<b>If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7</b>					

**Local Profile/Demography of the Groups affected Employee Data updated FEB 2014  
(population figures)**

<b>General</b>	Total number of employees in the CCG is 94
<b>Age</b>	63.84% of staff are aged 30-55 21.27% of staff are over 55 14.89% of staff employed are under 30
<b>Race</b>	87.24% of staff employed in the CCG declared themselves White 9.58% of staff are not stated/undefined 1.06% of staff declared themselves Black 1.06% of staff declared themselves Mixed 1.06% of staff declared themselves Other
<b>Sex</b>	79.79% of staff employed are female 20.21% of staff employed are male
<b>Gender reassignment</b>	No information
<b>Disability</b>	82.98% of staff employed declared themselves as having no disability 17.02% of staff did not declare /undefined 0% of staff declared a disability  Local Population data: In Yorkshire and Humber the population statistics are: 81.65% Day-to-Day Activities Not Limited 9.92% Day-to-Day Activities Limited a Little 8.43% Day-to-Day Activities Limited a Lot
<b>Sexual Orientation</b>	65.96% of staff described themselves as heterosexual 32.98% did not wish to respond /undefined 1.06% described themselves as bisexual
<b>Religion, faith and belief</b>	Christianity is the largest religious group declared by staff in the CCG (55.32%) 34.05% were undefined or did not wish to declare 10.63% of staff declared other faith or religious beliefs
<b>Marriage and civil partnership</b>	62.77% of employees are married 21.28% of employees are single 7.45% of employees are divorced 4.26% of employees were undefined or did not wish to declare 2.12% of employees were legally separated 1.06% of employees are in a civil partnership 1.06% of employees were widowed
<b>Pregnancy and maternity</b>	No information yet as the CCG has not been established long enough to build meaningful data

### 3. Equality Impact Analysis: Equality Data Available

**Is any Equality Data available relating to the use or implementation of this policy, project or function?**

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 *Protected Characteristics* – referred to hereafter as *'Equality Groups'*.

Examples of *Equality Data* include: (this list is not definitive)

1. Application success rates *Equality Groups*
2. Complaints by *Equality Groups*
3. Service usage and withdrawal of services by *Equality Groups*
4. Grievances or decisions upheld and dismissed by *Equality Groups*
5. *Previous EIAs*

Yes - Employee data

No

Where you have answered yes, please incorporate this data when performing the *Equality Impact Assessment Test* (the next section of this document).

**List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function**

Consultation has taken place with Trade Union representatives locally and nationally

**Promoting Inclusivity  
How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation**

The policy addresses the need for appropriate dress in the workplace whilst being sensitive to the needs of staff with protected characteristics and embracing differing backgrounds . This contributes to promoting equality and diversity in the workplace.

#### 4. Equality Impact Analysis: Assessment Test

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
<b>Gender</b> (Men and Women)	✓			The policy does not positively or negatively affect groups with this protected characteristic
<b>Race</b> (All Racial Groups)		✓		In para 5.2 the CCG recognises 'the diversity of cultures, religions and disabilities' It also recognises the requirement that all dress should adhere to Health and Safety and Infection Control regulations 1.06% of staff declared themselves Other and 9.58% of staff are not stated/undefined.
<b>Disability</b> (Mental and Physical)		✓		The diversity of cultures, religions and disabilities' is recognised in para 5.2. Some staff may need modifications to the standard uniform for reasons arising from a disability e.g. special footwear. This will be accommodated within the constraints of Health and Safety where possible. It is also recognised that some staff may have specific medical conditions e.g. allergic reactions to materials which will need to be addressed on an individual basis. The policy is designed to take account of individual circumstances. No staff in the CCG have declared a disability, however the CCG prepares its policies on the basis of good practice in the event staff with disabilities are employed in the future
<b>Religion or Belief</b>		✓		<i>Eweida v British Airways Plc</i> - a dress code is justified if there is a genuine and important reason for it and the discriminatory impact of the policy has been assessed. It is also a requirement that it is applied consistently. In para 5.2 the CCG recognises 'the diversity of cultures, religions and disabilities' It also recognises the requirement that all dress should adhere to Health and Safety and Infection Control regulations. 10.63% of staff declared other faith or religious beliefs 34.05% were undefined or did not wish to declare
<b>Sexual Orientation</b> (Heterosexual, Homosexual and Bisexual)	✓			The policy does not positively or negatively affect groups with this protected characteristic

**What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?**

<b>Protected Characteristic:</b>	<b>No Impact:</b>	<b>Positive Impact:</b>	<b>Negative Impact:</b>	<b>Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists</b>
<b>Pregnancy and Maternity</b>	✓			The policy does not positively or negatively affect groups with this protected characteristic
<b>Transgender</b>		✓		The dress code for any member of staff going through gender reassignment should be dealt with sensitively on an individual basis. The policy is designed to take account of individual circumstances (para 5.2). Currently there is no employee data for this protected characteristic
<b>Marital Status</b>	✓			The policy does not positively or negatively affect groups with this protected characteristic
<b>Age</b>	✓			The policy does not positively or negatively affect groups with this protected characteristic

**5. Action Planning**

**As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?**

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
None				Next policy review

## 6. Equality Impact Analysis Findings

<b>Analysis Rating:</b>	<input type="checkbox"/> Red	<input type="checkbox"/> Red/Amber	<input type="checkbox"/> Amber	<input checked="" type="checkbox"/> Green
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		Actions	Wording for Policy / Project / Function
<p><b>Red</b></p> <p><b>Stop and remove the policy</b></p>	<p><b>Red:</b> As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. It is recommended that the use of the policy be suspended until further work or analysis is performed.</p>	<p><b>Remove the policy</b></p> <p>Complete the action plan above to identify the areas of discrimination and the work or actions which needs to be carried out to minimise the risk of discrimination.</p>	<p>No wording needed as policy is being removed</p>
<p><b>Red Amber</b></p> <p><b>Continue the policy</b></p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken.</p>	<p><b>The policy can be published with the EIA</b></p> <p>List the justification of the discrimination and source the evidence (i.e. clinical need as advised by NICE).</p> <p>Consider if there are any potential actions which would reduce the risk of discrimination.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. However, a genuine determining reason exists which justifies the use of this policy and further professional advice.</p> <p><b><i>[Insert what the discrimination is and the justification of the discrimination plus any actions which could help what reduce the risk]</i></b></p>

### Equality Impact Findings (continued):

		Actions	Wording for Policy / Project / Function
<p><b>Amber</b></p> <p><b>Adjust the Policy</b></p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p><b>The policy can be published with the EIA</b></p> <p>The policy can still be published but the Action Plan must be monitored to ensure that work is being carried out to remove or reduce the discrimination.</p> <p>Any changes identified and made to the service/policy/ strategy etc. should be included in the policy.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> <p><b><i>[Insert what the discrimination is and what work will be carried out to reduce/eliminate the risk]</i></b></p>
<p><b>Green</b></p> <p><b>No major change</b></p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>The policy can be published with the EIA</b></p> <p>Another EIA must be completed if the policy is changed, reviewed or if any discrimination is identified at a later date</p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>

<b>Brief Summary/Further comments</b>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>
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<b>Approved By</b>		
<b>Job Title:</b>	<b>Name:</b>	<b>Date:</b>
Chief Officer	Simon Cox	12.08.14

## Appendix 2 Sustainability Impact Assessment

Staff preparing a policy, Governing Body (or Sub-Committee) report, service development or project are required to complete a Sustainability Impact Assessment (SIA). The purpose of this SIA is to record any positive or negative impacts that this is likely to have on sustainability.

<b>Title of the document</b>	Dress Code Policy
<b>What is the main purpose of the document</b>	<p>The Dress Code Policy is necessary in order to:</p> <ul style="list-style-type: none"> <li>• Present a smart and professional image, thereby increasing patient and public confidence.</li> <li>• Support infection prevention and control</li> <li>• Have regard to health and safety considerations for staff</li> </ul>
<b>Date completed</b>	23/04/14
<b>Completed by</b>	CSU Workforce

<b>Domain</b>	<b>Objectives</b>	<b>Impact of activity</b> Negative = -1 Neutral = 0 Positive = 1 Unknown = ? Not applicable = n/a	<b>Brief description of impact</b>	<b>If negative, how can it be mitigated?</b> <b>If positive, how can it be enhanced?</b>
<b>Travel</b>	<p>Will it provide / improve / promote alternatives to car based transport?</p> <p>Will it support more efficient use of cars (car sharing, low emission vehicles, environmentally friendly fuels and technologies)?</p> <p>Will it reduce 'care miles' (telecare, care closer) to home?</p> <p>Will it promote active travel (cycling, walking)?</p> <p>Will it improve access to opportunities and facilities for all groups?</p>	n/a		
<b>Procurement</b>	Will it specify social, economic and environmental outcomes to be accounted for in procurement and	n/a		

	<p>delivery?  Will it stimulate innovation among providers of services related to the delivery of the organisations' social, economic and environmental objectives?  Will it promote ethical purchasing of goods or services?  Will it promote greater efficiency of resource use?  Will it obtain maximum value from pharmaceuticals and technologies (medicines management, prescribing, and supply chain)?  Will it support local or regional supply chains?  Will it promote access to local services (care closer to home)?  Will it make current activities more efficient or alter service delivery models</p>			
<b>Facilities Management</b>	<p>Will it reduce the amount of waste produced or increase the amount of waste recycled?  Will it reduce water consumption?</p>	n/a		
<b>Workforce</b>	<p>Will it provide employment opportunities for local people?  Will it promote or support equal employment opportunities?  Will it promote healthy working lives (including health and safety at work, work-life/home-life balance and family friendly policies)?  Will it offer employment opportunities to disadvantaged groups?</p>	1	The policy contributes to promoting equality and diversity in the workplace as it addresses the need for appropriate dress in the workplace whilst being sensitive to the needs of staff with protected characteristics and embracing differing backgrounds.	
<b>Community Engagement</b>	<p>Will it promote health and sustainable development?  Have you sought the views of our communities in relation to the impact on sustainable development for this activity?</p>	n/a		
<b>Buildings</b>	<p>Will it improve the resource efficiency of new or refurbished buildings (water, energy, density, use of existing buildings, designing for a longer lifespan)?</p>	n/a		

	<p>Will it increase safety and security in new buildings and developments?</p> <p>Will it reduce greenhouse gas emissions from transport (choice of mode of transport, reducing need to travel)?</p> <p>Will it provide sympathetic and appropriate landscaping around new development?</p> <p>Will it improve access to the built environment?</p>			
<b>Adaptation to Climate Change</b>	<p>Will it support the plan for the likely effects of climate change (e.g. identifying vulnerable groups; contingency planning for flood, heat wave and other weather extremes)?</p>	n/a		
<b>Models of Care</b>	<p>Will it minimising 'care miles' making better use of new technologies such as telecare and telehealth, delivering care in settings closer to people's homes?</p> <p>Will it promote prevention and self-management?</p> <p>Will it provide evidence-based, personalised care that achieves the best possible outcomes with the resources available?</p> <p>Will it deliver integrated care, that co-ordinate different elements of care more effectively and remove duplication and redundancy from care pathways?</p>	n/a		