Appendix E

Equality Impact Assessment (EIA)

Name of Policy or Practice	The Workwise Framework		
Head of Service responsible for the Policy or Practice	Eryl Rowlands - Head of Revenues and Benefits Service and Senior Change Lead for the Modernisation Programme		
Name of officer (s) completing impact assessment form	Emma Roberts - Corporate Modernisation Manager		
Service	CIDT	Date of Assessment	16th October 2014

EIA Completed by :		EIA Agreed by Head of Service :	
Date	21.10.14	Date	21.10.14
Name(s)	Emma Roberts	Name	Eryl Rowlands
Signature(s)	*ERoberts.*	Signature	*E. W. Rowlands*

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1.   What is being assessed? *(Please double click on the box and select 'checked' as appropriate to cross X)*

☒   New and revised policies or practices

☒   New procedures (which modify service delivery or employment practices)

☐   Service review or re-organisation proposals which affect the community and/or staff

☐   Efficiency or saving proposals

☐   Setting budget allocations for new financial year

☐   Decisions affecting service users, employees or the wider community

☐   New project proposals affecting staff, communities or accessibility to the built environment, eg, new construction work or adaptations to existing buildings

☐   Other please explain in the box below :

2. What are the overall aims and objectives of the policy or practice ?

This framework has been developed as a guide for how Conwy County Borough Council will implement a new operating model (the way in which we work), namely 'Workwise' in its services in order to provide continued support to the delivery of the vision and priorities within its Corporate Plan 2012-2017 in a way that, also, proactively addresses the financial pressures and changing policy and legislative environment it faces.

The principles within the framework provide guidance for developing the new ways of working and new ways of doing things. The Framework sets out:

1.   An illustration of the Conwy County Borough Council's new operating model (Workwise)
2.   The guiding principles for the authority to base its service remodelling upon. It acts as a 'working aide' for those who will be remodelling the way in which services work in the council.
3.   How Manager's discretion can be utilised to apply the Framework appropriately within a Service in a consistent, reasonable and fair manner.

3. Who is the policy or practice intended to help or benefit (stakeholders) ?

The implementation of the Workwise Framework will benefit employees in the main as it will:
- Maintain the current high level of staff morale and job satisfaction
- Maintain the current high level of satisfaction with work/life balance
- Improve the attendance level of staff
- Improve working conditions / environment

Implementation of the Framework will provide employees with the opportunity to:
1. have flexible start/finish/rest times and hospital/medical appointments
2. meet requirements of religious observant
3. take/collect children from school or other caring responsibilities

The implementation of the framework will also benefit customers as it will:
- Improve customer service
- Create consistency across Services in terms of professional customer standards and good practice
- Improve responsiveness
- Increase collaboration with other public sector organisations
- Allow for continued compliance with the Authority's Welsh Language Scheme

Implementation will also benefit the Council as it will:
- Lead to a reduction in carbon emissions / reduction in carbon footprint via reduction in office space, reduction in staff travel, increase in green travel
- Lead to a reduction in print consumables particularly the amount of paper used
- Lead to a reduction in staff travel
- Reduce the office space used
- Maintain a high standard of performance
- Increase joint business support functions
- Lead to a reduction in modern record storage costs

4. Who are the main consultative groups or communities of interest ?

The main consultative groups are employees, Staff Council, the Trade Unions, the Senior Leadership Team, the Senior Management Team including all Heads of Service, the Modernisation Programme Quality Assurance Group and the Modernisation Programme Board, Elected Members in terms of Principal Scrutiny and Cabinet.

STEP 2 - Consider Existing Information and What This Tells You

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics *and* with those who have an interest in the way you carry out your functions**. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5.   What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

Protected Group	Relevance of the policy / practice by protected characteristic
Race	According to the Employee Monitoring Report for 2012/13 (2013/14 report not available until January 2015), employees from an ethnic minority background make up 0.7% of the Council's current permanent workforce. The implementation of the Framework should not have any impact on this protected group. The implementation of the Framework has been piloted in Adult Social Care and Community Services and IT Technical Services where employees from an ethnic minority background make up 2.1% of the workforce (Adult Social Care and Community Services) and 0% (IT Technical Services). As part of the ongoing pilot implementation, consultation was undertaken prior to implementation, during and at the end of the testing period and no feedback was received in regard to race issues.

Disability	At present, 2% of the Council's Workforce has declared that they have a disability. In terms of Adult Social Care and Community Services, this equates to 3.8% and 6.25% for IT. Feedback from consultation with both of the above Services where the implementation of the Framework has been piloted highlighted: - The need for standardised orthopaedic chairs across the Authority as this allows staff to undertake a DSE assessment of their workstation and then adjust the chair accordingly no matter where they sit on a particular day - The need to communicate the requirement to undertake the initial DSE assessment and for a change champion to be in place to explain this on the ground and support chair adjustments etc - The possiblity of having a zone or space with standing desks as employees sitting too much and for those with back problems - That all meeting rooms / break out spaces / canteen areas have to be DDA compliant - The need for standardised desks for all that can be easily adjusted if required - The need to include 'Specialist Users' within the Workwise protocol as certain desk spaces will be set up for a particular person to use and if they are in the office, they should have priority use of that space - The need to ensure that those with hearing difficulties have access to soft phones i.e. headsets linked to their computer to block out noise as necessary All of the above points will be addressed as part of the rollout of the Framework to Services. Information received from other Local Authorities who have implemented agile working such as Flintshire suggests that implementation would have a positive impact for disabled employees, as it would enable them to start/finish work when required eg, if an employee takes medication which carries side effects, such as drowsiness, they can start work later or they can work at home.
Sex	The Council's Workforce is made up of 74% women and 26% men. This equates to 85% (women) and 15% (men) for Adult Social Care and Community Services and 26% (women) and 74% (men) in IT. There has been no feedback from both of these pilot areas in regard to any adverse impact on this protected characteristic.

Age	The current workforce age profile is as follows: 4% - age 16-24, 60% - age 25-49, 33.8% - age 50-64, 2.2% - age 65+. In terms of Adult Social Care and Community Services, this equates to: 1.5% - age 16-24, 50.6% - age 25-49, 45.8% - age 50-64, 2.1% - age 65+. For IT, this equates to: 0% - age 16-24, 80% - age 25-49, 20% - age 50-64, 0% - age 65+. As part of the ongoing pilot implementation, consultation was undertaken prior to implementation, during and at the end of the testing period and no feedback was received in regard to age. Information received from other Local Authorities who have implemented agile working suggests that working in an agile manner is advantageous for employees who have childcare commitments or other caring responsibilities. Nationally, the majority of employees who have children are aged between 25 and 48 years of age. For Conwy, this would meand that the implementation of Workwise would be very advantageous for around 60% of the workforce.
Religion & Belief	According to the Employee Monitoring Report for 2012/13, the workforce's region and belief profile is as follows; 0.32% Agnostic 0.06% Buddhist 17.9% Christian 0.08% Hindu 0.02% Jehovah Witness 0.02% Jewish 0.02% Muslim 7.6% No religion 0.83% Other 73.1% Not stated Adult Social Care and Community Services' profile is as follows: 33.4% Christian

	14.6% No religion 1.9% Other 48.7% Not stated IT's profile is as follows: 36.25% Christian 43.75% No religion 11.25% Not stated There has been no feedback from both of these pilot areas in regard to any adverse impact on this protected characteristic. The implementation of the Workwise Framework would allow those from different faiths to manage their attendance at work around their religious commitments and ceremonies.
Sexual Orientation	The Employee Monitoring Report for 2012/13 states that 0.44% of the workforce are Gay, Lesbian or Bisexual. This information is not broken down further on a service by service basis. There has been no feedback from both of the pilot areas in regard to any adverse impact on this protected characteristic.
Gender Reassignment	The Employee Monitoring Report for 2012/13 states that 0.14% of the workforce are transgender. This information is not broken down further on a service by service basis. There has been no feedback from both of the pilot areas in regard to any adverse impact on this protected characteristic.
Marriage & Civil Partnership	58.7% of the Council's workforce is married or in a civil partnership. This equates to 59.5% in Adult Social Care and Community Services and 50% in IT.

	There has been no feedback from both of the pilot areas in regard to any adverse impact on this protected characteristic.
Pregnancy & Maternity	The Employee Monitoring Form data is not currently up to date regarding those employees who are pregnant or on maternity. There has been no feedback from both of the pilot areas in regard to any adverse impact on this protected characteristic.
Welsh Language	The Framework will be produced in both English and Welsh.
Other (please state)	

6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
Employment Monitoring Form 2012/13 Feedback from those services piloting Workwise - Adult Social Care and Community Services and IT Technical Services Analysis of feedback from questionnaire circulated to pilot areas - collated all feedback that was associated with equalities	Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits
Research or Comparative Information	**Examples**
Agile Working Policies and Procedures from other Local Authorities where agile working has been implemented and is working Agile Working Equality Impact Assessments from other Local Authorities	Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)

7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

    Yes ☒   No ☐   *(please cross as appropriate X)*   If Yes, please proceed to Step 3

    If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were :

STEP 3 - Procurement and Partnerships

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty.

8.   Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes ☐   No ☒   *(please cross as appropriate X)*   If No, please proceed to Step 4

9.   If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about :

Procurement
- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor compliance

Partnerships
Who is responsible for :
- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners

STEP 4 - Assessing the Impact

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

> There is an overall potential impact on women, as they make up 74% of the workforce profile. However, as the Workwise Framework is being rolled out on a service by service basis and this could take up to 2 years, the services all have different gender profiles which could mean that the impact on women is greater during a particular 6 months and then men for the next 6 month period.
>
> Consultation in the pilot areas has highlighted certain issues for disabled employees and measures have been taken to minimise thes issues as much as possible. These measures will be implemented as part of the rollout of the Workwise Framework to ensure an adverse impact does not occur in the future.
>
> In terms of positive take up, consultation has shown that the implementation of the Workwise Framework in the pilot areas does allow more flexibility for those with childcare commitments or other caring responsibilities.

11. Does the geography or demography of any groups reveal anything?

> The Council's three main sites are located across the Coastal belt of the County in Conwy, Mochdre and Rhos on Sea. There are also satellite bases in rural areas. The implementation of the Workwise Framework will mean that employees will have a main base but can also work from any site where necessary and practicable to do so. This should therefore make it easier for those with childcare commitments or caring responsibilities to work closer to home and this would also be the case for disabled employees.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

> The rules or requirements of the Framework are not inflexible, neither is the way in which it is delivered, therefore it will not prevent or reduce any of the protected groups involvement or use.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

Not applicable.

14. Do any of these limitations amount to unlawful discrimination?

Yes ☐   No ☒   Not Sure ☐
(please cross as appropriate X)

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

Race	Black Minority Ethnic groups Gypsies / Travellers Language
Disability	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities
Sex	Men Women
Age	Older People Children Young People
Religion & Belief	Faith communities
Sexual Orientation	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment	A person who proposes to, starts or has changed his or her gender

Marriage & Civil Partnership	
Pregnancy & Maternity	
Human Rights	Right to Education, Private and Family Life, Protection of property, etc
Welsh Speaking Communities	
Other socially excluded groups or communities (please state)	

15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes ☒   No ☐   Not Sure ☐
(please cross as appropriate X)

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

It has been identfied that there could potentially be a a differential impact on men and women due to Conwy's workforce gender profile. Consultation has highlighted a differential impact for disabled employees but any issues have been mitigated in the pilot areas and these mitigating measures will be put in place for the rest of the rollout of the Framework to services.

17. Do you have enough information to make an informed judgement?
Yes ☒   No ☐   *(please cross as appropriate X)*

If you answered Yes, please justify:
The information has come from analysis of the Council's overall Workforce profile and feedback from consultation with Services that have been piloting the Workwise Framework. Each of the protected groups are represented within those services.

If you answered No, what information do you require about protected groups?
N/A

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:
N/A

STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

It will be ensured that once the Framework is rolled out, the following steps will be undertaken to ensure no disadvantage to disabled employees:

- Ensure that standardised orthopaedic chairs are used across the Authority as this will allow staff to undertake a DSE assessment of their workstation and then adjust the chair accordingly no matter where they sit on a particular day
- Ensure that the requirement to undertake the initial DSE assessment is communicated and that a change champion is in place to explain this on the ground and support chair adjustments etc
- Examine the possiblity of having a zone or space with standing desks as employees sitting too much and for those with back problems
- Ensure that all meeting rooms / break out spaces / canteen areas are DDA compliant
- Ensure that standardised desks are in place for all that can be easily adjusted if required
- Ensure that 'Specialist Users' are included within the Workwise protocol as certain desk spaces will be set up for a particular person to use and if they are in the office, they should have priority use of that space
- Ensure that those with hearing difficulties have access to soft phones i.e. headsets linked to their computer to block out noise as necessary

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

See section 19 above. We will also be consulting on the Framework with the Staff Council and the Trade Unions.

21. What actions could you take to achieve the same goal by an alternative means?

N/A	N/A

STEP 6 – Action Plan

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

Action	Measure of Success	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Actions to be taken before EIA and policy/practice can be signed off				

Actions after EIA and policy/practice signed off				
Present the Framework to Staff Council and Trade Unions	Framework presented and feedback received	End of November 2014	Emma Roberts	N
Ensure all measures as outlined in Section 19 are included in the Workwise Framework or Workwise Protocol	All measures as detailed in Section 19 made explicit in the Workwise Framework or in Workwise Protocol	End of November 2014	Emma Roberts	N

STEP 7 – Decision To Proceed

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(please cross as appropriate X)

Decision	Action

☒	Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
☐	Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
☐	Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
☐	No	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23.   Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice :

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
EIA actions to be monitored by the Programme Manager and Programme Board	Review Jan 2015	Emma Roberts and Programme Board	N

STEP 9 – Publishing the Equality Impact Assessment

Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.