

**EQUALITY IMPACT ANALYSIS
 WORKING TIME REGULATIONS POLICY
 HaRD 011**

1. Equality Impact Analysis	
Policy / Project / Function:	Working Time Regulations Policy
Date of Analysis:	08 September 2014
This Equality Impact Analysis was completed by: (Name and Department)	Workforce Service
What are the aims and intended effects of this policy, project or function ?	This document sets out the CCG's standard Working Time Regulations and includes staff undergoing secondary employment. It has been drafted to comply with statutory requirements.
Please list any other policies that are related to or referred to as part of this analysis	<ul style="list-style-type: none"> • Disciplinary Policy • Annual Leave Policy • Grievance Policy • Business Conduct Policy • Secondary Employment Policy
Who does the policy, project or function affect?	Employees <input checked="" type="checkbox"/> Service Users <input type="checkbox"/> Members of the Public <input type="checkbox"/>
Please Tick ✓	Other (List Below) <input checked="" type="checkbox"/> Agency workers Some contractors

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	
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Considered – neutral impact
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Workers who are between the ages of 16-18 are required to work fewer hours than adults. Whilst the CCG does not employ anyone in this age group, the policy is written to adhere to the legislation with regard to this. This policy will have a positive effect on younger workers who may be more likely to have secondary employment.
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Considered – neutral impact
Disabled People	<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>	The policy provides for the CCG to consider transferring night workers who are identified by a medical practitioner to suffer from health problems relating to the performance of night work to suitable available day work. This could support disabled staff where this is a concern and provide a positive impact. Whilst no employees in the CCG have declared a disability, the policy adheres to legislation and is available to staff who may become disabled in the future.
Gender	<input checked="" type="checkbox"/> <input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	This policy will have a positive effect on female workers who may be more likely to have secondary employment.

Transgender People	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Considered –neutral impact
Pregnancy and Maternity	<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>	The policy provides for the CCG to consider transferring night workers who are identified by a medical practitioner to suffer from health problems relating to the performance of night work to suitable available day work. This could support pregnant women where this identified as a concern.
Marital Status	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Considered –neutral impact
Religion and Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Considered –neutral impact
Reasoning					
If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7					

3 Equality Impact Analysis: Local Profile Data

Local Profile / Demography of the Groups affected as at July 2014

General	Total number of employees in the CCG is 22
Age	72.73% are aged 30-55 29.27% of staff are over 55 No employees are under 30
Race	90.9% staff employed in the CCG are White 4.55% staff are Black 4.55% of staff have are not stated/undefined their ethnicity
Sex	54.55% staff employed are male 45.45% staff employed are female
Gender reassignment	No information at this stage
Disability	86.36% of staff employed declared themselves as having no disability 13.64% did not declare /undefined No staff have declared a disability
Sexual Orientation	77.27% of staff described themselves as heterosexual 22.73% did not wish to respond /undefined
Religion, faith and belief	Christianity is the largest religious group declared by staff in the CCG (40.91%) 27.27% declared themselves Atheist 27.27% were undefined or did not wish to declare 4.55% of staff have other beliefs/religious beliefs
Marriage and civil partnership	81.81% of employees are married. No employees are in a civil partnership. The remainder (18.19%) are single/divorced/legally separated or widowed
Pregnancy and maternity	No information yet as the CCG has not been established long enough to build meaningful data

4 Equality Impact Analysis: Equality Data Available

<p>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 <i>Protected Characteristics</i> – referred to hereafter as ‘<i>Equality Groups</i>’.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <ol style="list-style-type: none"> 1. Application success rates <i>Equality Groups</i> 2. Complaints by <i>Equality Groups</i> 3. Service usage and withdrawal of services by <i>Equality Groups</i> 4. Grievances or decisions upheld and dismissed by <i>Equality Groups</i> 5. <i>Previous EIAs</i> 	<p>✓ Yes employee data</p> <p>No <input type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p>
<p>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</p>	<p>Consultation has taken place with local Trade Unions representatives</p>
<p>Promoting Inclusivity How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation</p>	<p>Provision of a framework to ensure all staff adhere to legislation to support health and well-being</p>

5 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
Gender (Men and Women)	✓			This policy will have a positive effect on female workers who may be more likely to have secondary employment.
Race (All Racial Groups)	✓			Considered – neutral impact
Disability (Mental and Physical)		✓		The policy provides for the CCG to consider transferring night workers who are identified by a medical practitioner to suffer from health problems relating to the performance of night work to suitable available day work. This could support disabled staff where this is a concern and provide a positive impact. Whilst no employees in the CCG have declared a disability, the policy adheres to legislation and is available to staff who may become disabled in the future.
Religion or Belief	✓			Considered – neutral impact
Sexual Orientation (Heterosexual, Homosexual and Bisexual)	✓			Considered – neutral impact
Pregnancy and Maternity		✓		The policy provides for the CCG to consider transferring night workers who are identified by a medical practitioner to suffer from health problems relating to the performance of night work to suitable available day work. This could support pregnant women where this identified as a concern.
Transgender	✓			Considered –neutral impact

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
Marital Status	✓			Considered – neutral impact
Age		✓		Workers who are between the ages of 16-18 are required to work fewer hours than adults. Whilst the CCG does not employ anyone in this age group, the policy is written to adhere to the legislation with regard to this. This policy will have a positive effect on younger workers who may be more likely to have secondary employment.

6 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:

7 Equality Impact Analysis Findings

Analysis Rating:	Red	Red/Amber	Amber	✓ Green
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		Actions	Wording for Policy / Project / Function
<p>Red</p> <p>Stop and remove the policy</p>	<p>Red: 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>Remove the policy</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>Red Amber</p> <p>Continue the policy</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>The policy can be published with the EIA</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><i>[Insert what the discrimination is and the justification of the discrimination plus any actions which could help what reduce the risk]</i></p>

Equality Impact Findings (continued):

		Actions	Wording for Policy / Project / Function
<p>Amber Adjust the Policy</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>The policy can be published with the EIA</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><i>[Insert what the discrimination is and what work will be carried out to reduce/eliminate the risk]</i></p>
<p>Green No major change</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>The policy can be published with the EIA</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>

Brief Summary / Further comments	
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Approved By :		
Job Title:	Name:	Date: