

## EQUALITY IMPACT ASSESSMENT

<b>Policy title:</b>	<b>Maximising Attendance Policy</b>
<b>Policy lead/ owner:</b>	HR
<b>Others involved in EqIA assessment group</b>	Assessment group included: HR Business Partner HR Senior Business Partner
<b>Policy implementation date:</b>	01/08/2024

### 1 Framing the policy

#### 1.1 Briefly describe the outcomes, aims and purpose of the policy:

This policy aims to support employees and managers who are absent from work through to illness, it ensures that all employees are treated fairly and consistently through the attendance management procedure and given the appropriate support to maximise their attendance.

The aims of this policy are to:

- guide employees and managers on the support mechanisms in place in SRUC to maximise employee's attendance.
- support managers role in monitoring absence levels and taking all reasonable steps to promote attendance at work within their designated area(s) of responsibility.
- inform employees of their obligations set out within this policy, including the reporting, certification, recording and communication procedures.

#### 1.2 Is the policy new or being changed, reviewed or stopped?

Reviewed in line with SRUC Policy review cycle.

### **1.3 Who is affected by this policy?**

This policy applies to all employees who have a contract of employment with SRUC and are absent from work due to sickness.

### **1.4 Are there any other SRUC policies that may be affected by this policy?**

Probation Policy, Special Leave Policy, Disciplinary Policy, Flexible Working Policy. Hybrid Working Framework. Maternity Leave Policy.

## **2 Evidence relevant to the policy including consultation**

The information you gather in this section will:

- help you to understand the importance of your policy/ practice/ process/ service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

**2.1 Evidence:** Set out in the table what you know about the experiences of people in terms of each equality group. Consider the diversity within each group (e.g. experiences of people from different religions or faiths) as well as the differences between groups. There may also be cumulative barriers experienced by people when you look at more than one group together (e.g. experiences of women of different minority ethnic groups, so the intersectional impact of sex and race).

**General evidence**

The policy is developed in line with legislation explained here [Taking sick leave - GOV.UK \(www.gov.uk\)](https://www.gov.uk/taking-sick-leave) and has been reviewed against the Advisory, Conciliation and Arbitration Service (ACAS) guide on Sickness Absence [Creating absence policies - Acas](https://www.acas.org.uk/creating-absence-policies).

It is ultimately concluded that the policy closely reflects the ACAS guidelines and covers SRUC's statutory obligations.

[2023 sickness absence rates soar to 10-year high \(personneltoday.com\)](https://www.personneltoday.com/sick-days-at-work-hit-highest-level-for-10-years) [Sick days at work hit highest level for 10 years - BBC News](https://www.bbc.com/news/business-64440003) explains that absence rates are likely to be higher in larger organisations. The research found, as in previous years, that average absence levels were considerably higher in the public sector (10.6 days per employee). Smaller organisations tended to have lower sickness absence rates than larger ones, with 5.0 days per employee recorded for employers with 50 or fewer staff, and 13.3 days for organisations with 5,000 or more people.

SRUC collate data on all periods of sickness absence, for the purpose of this EQIA the data is used for the period September 2022 – August 2023.

You can add more rows to present the evidence if required.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
Age	Internal data  <a href="https://www.ons.gov.uk/labourmarket/sicknessabsence">Sickness absence in the UK labour market – Office for National Statistics (ons.gov.uk)</a>	SRUC data shows the majority of employees (25%) sit within the 40–49-year-old age group followed by 24.6% of employee at 50–59 years old.  Evidence from the ONS shows the highest level of absence comes from employees within the 50+ age bracket, higher absence rates from women than men.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
		The internal data shows that the highest levels of sickness absence came from employees within the age group 35 – 44 (27%), followed by employees in the age bracket 25–34 (24%).
<b>Disability</b>	<p>Internal data</p> <p><a href="#"><u>Disability-related absence: Supporting disabled people at work - Acas</u></a></p> <p><a href="#"><u>Reasonable adjustments for workers with disabilities or health conditions - GOV.UK (www.gov.uk)</u></a></p>	<p>7.8% of SRUC employees report having a disability. 83.9% of employees report as non-disabled.</p> <p>Within the scope of employees who had sickness absence within the previous 12 months; 9% of employees consider themselves to have a disability. 83.5% of employee report no known disability, 7.5% prefer not to say/ no information.</p> <p>By law (Equality Act 2010), an employer must make adjustments for a person categorised as disabled, if the adjustments are reasonable. What is considered 'reasonable' depends on the circumstances.</p> <p>Employees with disability are covered under the Equality Act 2010, from the recruitment stages of employment.</p>
<b>Race</b>	Internal data	<p>SRUC holds data on ethnicity as part of our equality and diversity monitoring.</p> <p>The majority of SRUC employees reported as Scottish ethnicity (55.7%), followed by British (20%), therefor non-significant data in relation to race within the scope of sickness absence.</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
<b>Sex</b>	Internal data  <a href="https://www.ons.gov.uk/labourmarket/sicknessabsence/2023/08/01/09/23">Sickness absence in the UK labour market - Office for National Statistics (ons.gov.uk)</a>	<p>58.7% of SRUC employees identify as female, 39.1% as male, 0.1% identify as other and just over 2% of employees prefer not to say/have not given any information.</p> <p>In comparison 51% of Scotland's population are women, 49% men.</p> <p>Two thirds of employees (66.5%) with absence in the year September 2022 – August 2023 recorded as female, just under one third (31.8%) recorded as male and 1.63% prefer not to say.</p> <p>The ONS evidence shows that sickness absence rates for women compared to men. Men lost 1.8% of their working hours in 2021 (an increase of 0.3 percentage points from 2020) as a result of sickness or injury and women lost 2.6% of their working hours (an increase of 0.3 percentage points from 2020).</p> <p>The overall gender differences in sickness absence are due to relatively short absence spells being more common among women. In longer sickness absence spells the female excess is mainly explained by heavier burden of ill-health and to a lesser extent by higher physical work demands among women.</p> <p>14.7% of sickness from employees who report as female was through long term absence. The SRUC data also shows a higher percentage of absences were from short term absence (absences totalling less than 3 weeks).</p>
<b>Gender Reassignment</b>	Internal data	The majority of employees (68.36%) are the same gender identity as assigned at birth.

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	<a href="#">Absence from work because of gender reassignment – Citizens Advice</a>	<p>The Equality Act states it is unlawful for an employer to treat you worse or less favourably than they would if you were absent because of sickness or injury and if you are absent from work because of gender reassignment.</p>
Sexual orientation	Internal data	<p>SRUC data shows 78.4% of employee's sexual orientation is heterosexual, 17.5% is unknown/prefer not to say and 3.8% of employees identify within LGBT+ groups.</p> <p>Sickness absence over the past 12 months shows similar percentages; 81% of employees report as heterosexual, 15% is unknown/prefer not to say and 4% of employees who identify within LGBT+ groups.</p>
Religion or Belief	Internal data	<p>The majority of employees in SRUC have no religious or philosophical belief (45.7%), this is followed by Christian – Protestant (18.1%), Christian – other (5.7%) and Christian Catholic (5.4%).</p> <p>Employee with sickness absence over the period, the majority (48.5%) have no religion or philosophical belief. followed 16.5% Christian – Protestant.</p>
Pregnancy or maternity	<a href="#">Pregnant employees' rights – GOV.UK (www.gov.uk)</a> <a href="#">If they're ill or having a difficult pregnancy: Managing your</a>	<p>Pregnancy related absence does not equate to a trigger point under SRUC Sickness Absence Policy, Maximising Attendance, and are recorded separately to all other absences.</p> <p>Any absence within 4 weeks of an employee's due date will automatically start an employee's maternity leave.</p>

Equality characteristics	Evidence source (e.g. web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/ practice/ process/ service? Lack of evidence may suggest a gap in knowledge/ need for consultation (step 3).
	<a href="#">employee's maternity leave and pay - Acas</a>	4 employees recorded pregnancy related absence in the year Sept 2022 – Aug 2023.
<b>Marriage or civil partnership</b>	Internal data	The majority of employees (45.9%) report their personal status as married, followed by 25.3% single and 16.5% living together. Similar percentages are shown in the sickness absence data, 44% married, 25% single and 20% cohabiting.

**2.2 Consultation and stakeholder involvement:** Speaking to people who will be affected by your policy/ practice/ process/ service can help clarify the impact it will have on different equality groups. Describe below what you learned from the consultation/ involvement. Consultation can take time so make sure that you build this into your policy review/ development timeline.

This policy is currently being developed in consultation with all SRUC recognised Trades Unions, Prospect, EIS and Unison, who represent all staff throughout the organisation.

In addition, as this is an internal policy, SRUC will also consult with all employees through the policy review process. These include the SRUC Rainbow Network.

**2.3 Record here if you need to undertake a full equality impact assessment based on your evidence above.**

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality	No	Proceed to sign off (step 5) to agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups	Yes	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all of the equality groups	Yes	Proceed to Step 3: complete full EqIA

**3 Impact on equality groups and changes to policy**

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- **Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010?**
- **Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?**
- **Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?**

**3.1 Does the policy have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics? In the tables below, record the impact of the policy, as it is planned or as it operates, might have on each equality characteristic and describe what changes in policy or actions will be required to mitigate that impact or to take advantage of a positive impact.**

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
Age	Potential for discrimination	X			<p>The age range of absences differs from the national average, SRUC has a higher number of staff in the age brackets 40+ however the majority of absences occur with staff aged 25-44 years old. Reviewing absence reports, business areas, nature of roles and reasons for absence to understand the reason for this absence will be reviewed ongoing to identify any key areas for HR.</p> <p>Inconsistencies in the application of the policy and attendance management. Policy and process will be applied consistently. Additional managers guidance and training sessions will be rolled out as part of the policy launch.</p> <p>There is a Menopause and Menstruation policy in place to support employees who may suffer symptoms of menopause or menstruation.</p>
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			
Disability	Potential for discrimination		X		

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
	Potential to advance equality of opportunity	X			<p>The policy and guidance include advice on reasonable adjustments and provides examples for managers to support employees.</p>
	Potential to foster good relations	X			<p>The policy gives guidance for employees covered by the probation policy. Reviewing absence reports, business areas, nature of roles and reasons for absence to understand the reason for this absence will be reviewed ongoing to identify inconsistencies in the application of the policy and attendance management. Policy and process will be applied consistently. Additional managers guidance and training sessions will be rolled out as part of the policy launch. Managers should follow the process for every employee after ever absence.</p> <p>The policy uses inclusive language. The policy is formatted to promote accessibility. The policy also offers the accessibility in alternative formats.</p>

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					The policy will be published with the option of immersive format and accessibility mode.
Race	Potential for discrimination			X	SRUC includes a statement in the policy to encourage engagement with people of different races and directs employees to alert HR if the policy presents any barriers. We will continue to promote this policy and monitor absences, disaggregated by race.
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			
Sex	Potential for discrimination		X		The policy advises that managers should consider reasonable timeframes for adjustments and any changes. Managers are reminded to consider working patterns, especially part time, when arranging meetings. Clear guidance on any unplanned absences from work and the correct policy for recording and management of any absence.
	Potential to advance equality of opportunity	X			
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					<p>There is a potential link between special leave and sick leave, guidance will help managers complete a return to work and also use "reasonable" time off.</p> <p>There is a Menopause and Menstruation policy in place to support employees who may suffer symptoms of menopause or menstruation.</p> <p>The policy uses inclusive language.</p>
Gender Reassignment	Potential for discrimination			X	<p>The policy offers guidance to managers who may have employees who are transitioning at work. This information will also be included in the new Trans Inclusion Policy under development in collaboration with SRUC's EDI lead.</p> <p>SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers.</p> <p>The policy uses gender neutral language throughout. We will continue to promote</p>
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
					this policy and monitor, disaggregated by gender reassignment.
Sexual orientation	Potential for discrimination			X	SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers. The policy uses gender neutral language throughout the policy. The policy will be open to all employee for feedback, including the staff Rainbow Network.
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			
Religion or Belief	Potential for discrimination			X	SRUC promotes engagement with the policy to people who identify with this protected characteristic directs employees to alert HR if the policy presents any barriers. We will continue to promote this policy and monitor, disaggregated by gender reassignment.
	Potential to advance equality of opportunity			X	
	Potential to foster good relations	X			
	Potential for discrimination			X	

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
Pregnancy or maternity	Potential to advance equality of opportunity	X			<p>The policy advises that managers should consider reasonable timeframes, including extended timescales for completion, for review at all stages of the procedure.</p> <p>The Policy gives clear guidance for employees who are pregnant and the support available, including risk assessments. Pregnancy related absences will not count towards trigger points but will be monitored for ongoing support.</p> <p>Pregnancy related absences in the 4 weeks before the (EWC) due date will automatically start maternity leave. The policy details the different pay elements (sick pay and OMP/SMP).</p> <p>Managers are reminded to consider working patterns, especially part time, when setting meetings/ review periods in the policy and supporting guidelines.</p>
	Potential to foster good relations	X			
Marriage or civil partnership (in	Potential for discrimination			X	<p>SRUC promotes engagement with the policy to people who identify with this protected characteristic directs</p>
	Potential to advance equality of opportunity			X	
	Potential to foster good relations			X	

Equality group	Public sector equality duty	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. E.g. to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
		Positive impact	Negative impact	No impact	
employment only)					employees to alert HR if the policy presents any barriers.

**3.2 Think about and describe below how your assessment impacts on your policy review/ development timeline including but not limited to:**

- Procurement criteria: do you need to include specific equality criteria as part of the technical specification?
- Communication plan/ products: do you need to communicate with people affected by this policy/ practice/ service/ process in a specific format (e.g. audio, subtitled video, different languages)?
- Cost: do you propose any actions because of this assessment which will incur additional cost?
- Resources: do the actions you propose require additional or specialist resource to deliver them?

**3.3 Record the outcome of this assessment below having considered the potential or actual impacts of your policy/ practice/ process/ service on equality groups. Choose from one of the following (mark with an X or delete as appropriate):**

**Note: You must take action to remove barriers or take advantage of positive opportunities BEFORE the policy goes live.**

Please select (X)	Implications for the policy/ practice/ process/ service
X	<b>No major change:</b> Your assessment demonstrates that the policy service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.

	<b>Adjust the policy:</b> You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy when implemented.
	<b>Continue the policy:</b> The policy will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.
	<b>Stop and remove the policy:</b> The policy will not be implemented due to adverse effects that are not justified and cannot be mitigated.

#### 4 Monitoring policy impact and further actions

It is important to continue to monitor the impact of your policy/ practice/ process/ service on equality groups to ensure that your actual or likely impacts are those you recorded. Your monitoring information will also inform a future review of the policy.

**4.1 Record in the table below how you intend to monitor the impact of this policy/ practice/ process/ service on equality groups. In the table below you should:**

- list the relevant measures,
- Identify who or which team is responsible for implementing or monitoring any changes
- Where the measure will be reported to (e.g. committee, ELT, Board) and how often.

Measure	Lead department/ individual	Reporting (where/ frequency)
The data around Absence will be reported on through CBS and also the ER tracker	HR Operations HR Data	Monthly – reporting (CBS) Annual – Mainstreaming report

**4.2 Record further actions or changes required after the policy is implemented in the table below. Make it clear if there are no outstanding actions.**

Action	Lead department/ individual	Action target date
Recording of absence on ER tracker.	HR Ops	Ongoing
Absence reports, business areas, roles and absences, patterns	HR Data	6 monthly
Special leave policy clear on reasonable leave and also where policies link, e.g. hybrid working.	HRBP	April 2024
Trans Inclusion Policy to include clear guidance on absence while transitioning	HR/EDI	September 2024
Inclusion to new HR system and reporting	HR Data	TBC

## 5 Sign off and future review

Equality impact assessments must be signed off by the relevant Head of Service/ Department, even where an EqIA is not required. Also note here when you plan to review the policy and accompanying EqIA which should be no later than 5 years from policy implementation.

### 5.1 Senior Responsible Owner/ Committee sign off.

Job/ Committee title: Chief People Officer

Date: 14/08/2024

### 5.2 Equality impact assessment review date.

Date: 14/08/2029

**Important: You must send the final version of this equality impact assessment to:**

- the Equality Diversity & Inclusion Lead.
- the Communications team for publication on SRUC's equality page on the external website.

<b>Document control:</b>	<b>VO.1</b>	
<b>Date policy live from:</b>	<b>01/10/2024</b>	
<b>Review/ Approval Group:</b>	<b>Human Resources</b>	
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