

Section 4 Integrated Impact Assessment

Summary Report Template

Each of the numbered sections below must be completed

Interim report	<input type="checkbox"/>	Final report	<input type="checkbox"/>	(Tick as appropriate)
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1. Title of proposal

Conduct Related Policy Review Project -

10 conduct related policies will be reviewed following the recommendations of the Inquiry and Review to determine how these could be consolidated and clarified to aid compliance and investigation in future.

2. What will change as a result of this proposal?

The main change to each policy is outlined below:

Discipline Policies (LGE & Teaching Staff) – addition of requirement to complete declaration of independence form for Nominated and Investigating Officers.

Grievance Policy (LGE & Teaching Staff)– consolidated with Avoidance of Bullying and Harassment Policy to provide one streamlined process for considering all employee complaints.

Avoidance of Bullying and Harassment Policy – see above.

Personnel Appeals Committee (PAC) Grievance Appeals Policy – streamlined into one policy to cover all appeals that are heard by PAC.

Personnel Appeals Committee Discipline Appeals Policy - see above.

Employee Code of Conduct – requirement added to record personal relationships on HR records.

Alcohol, Drugs and Substance Misuse Policy – no major changes other than formatting and language.

Violence At Work Policy – renamed Protecting Colleagues in the Workplace Policy and expanded to cover colleague on colleague incidents as well as service user on colleague incidents. Consolidated with existing Managing Customer Contact in a Fair and Positive Way.

3. Briefly describe public involvement in this proposal to date and planned

Impact on internal colleagues only therefore no public involvement necessary

4. Is the proposal considered strategic under the Fairer Scotland Duty?

All employment policies will take into consideration the responsibilities outlined in the Fairer Scotland Duty and seek to reduce inequality caused through socio-economic disadvantage for our colleagues.

5. Date of IIA

As the IIA covered a number of policies under the Inquiry & Review, the IIA took place over a number of months commencing in June 2022 and updated following each policy review.

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Emma Kilpatrick	Lead HR Consultant	18 May 2022
Caroline McKellar	Senior HR Consultant	
Stefanie Thompson	Senior Solicitor	
Richard Thrall	Governance Officer	
Nina Kwiatkowski	Senior HR Consultant	

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	Employee Data demographics as at 06062022	See slides.
Data on service uptake/access	Data from Business Hub. Anecdotal feedback from Casework	See slides.
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	Employee Data demographics as at 06062022	The majority of colleagues within the organisation sit within the mid to lower grades. While everyone is in receipt of the Living Wage, it does suggest these policies will have a bigger impact on those on lower income.
Data on equality outcomes	Theme 5: Diverse and Inclusive Workplace. A more diverse and inclusive working environment is experienced by colleagues who share protected characteristics and colleagues are supported by an inclusive culture workplace culture and feel confident to challenge	<p>The Code of Conduct outlines how we expect colleagues to behave while working for the Council. It must set out this inclusive and supportive approach we want to achieve and the behaviours / conduct which will enhance this.</p> <p>These policies will also set out the formal mechanisms for employees to raise and record concerns and unacceptable behaviour, and much include informal and early resolution to encourage a supportive environment as well as demonstrating the Council's commitment towards protecting staff from discrimination and prejudice.</p>
Research/literature evidence	<p>Grievances / Disciplinarys: ET quarterly statistics</p> <p>Substance Misuse: Harmful & Probably dependent drinking in adults</p>	<p>The ET stats for 2020-21 (this year's not fully available) show that while the main stated reason for a claim was unfair dismissal (likely linked to discipline), claims for Age and Disability Discrimination are also higher in comparison to the other protected characteristic discrimination claims. These are likely to have been raised as grievances prior to escalation and therefore steps must be included to ensure these (as well as other potential discrimination) grievances are taken seriously and investigated fully.</p> <p>In relation to Substance Misuse Policy, stats are a little outdated however reflect that White British Men are more likely to drink to harmful or dependent levels in the UK in comparison to other genders and ethnicities. In each of the identified ethnicities, Men were more prone to high levels of drinking than women. Therefore while the policy will be made accessible to all, we may wish to consider some targeted awareness campaigns towards men. Demographics from the Council show that more than 50% of the Place directorate is male which is contrary to all other directorates which are overwhelmingly female.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	ONS Alcohol specific deaths in the UK 2020 Illicit Drug Use	<p>Statistics show in that 2020, Scotland had the highest number of alcohol-specific deaths – 21.5 deaths per 100000 people. Therefore this is a substance misuse could be a prevalent issue that will impact colleagues within the Council either directly or indirectly.</p> <p>The most recent data available notes that Black men and women are more likely to have used illicit drugs. While black colleagues account for less than 2% of the Council, statistics for White Males is also considerably high (11.8%)</p>
Public/patient/client experience information	n/a	
Evidence of inclusive engagement of people who use the service and involvement findings	Anecdotal feedback from colleagues & TUs who have been part of the policies / processes	
Evidence of unmet need	n/a	
Good practice guidelines	Acas Disciplinary & Grievance Procedures Independent Inquiry Report	<p>Ensuring reasonable adjustments throughout the processes to ensure those with disabilities can fully participate.</p> <p>Those in close personal relationship (i.e. romantic relationships) with other Council employees have to declare to mitigate conflicts of interest.</p>
Carbon emissions generated/reduced data	n/a	
Environmental data	n/a	
Risk from cumulative impacts	n/a	
Other (please specify)	n/a	
Additional evidence required	n/a	

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
Positive	

<p>All new policies are underpinned by Our Behaviours and link to Speak Up Supporters to support culture change.</p> <p>The Code of Conduct outlines our expectations from all colleagues in terms of our approach to bullying, harassment and discrimination.</p> <p>A revised, streamlined ABH / Grievance approach will provide clear guidance to colleagues on how to raise and address discrimination / harassment concerns. One streamlined policy will provide consistency in case management, one process for colleagues to follow and one conclusion. Ensuring a more accessible process.</p> <p>The revised Violence at Work Policy will introduce guidance and information for colleagues raising awareness of the different types of harassment, and what steps they can take to prevent it within their work areas.</p> <p>The revised Violence at Work Policy merges the prejudice-based reporting process with other H&S incident recording. This is an established process which colleagues are familiar with, and already using it for external incidents. This should encourage recording.</p> <p>By ensuring all new policies are written in Plain English and available in other formats, as well as in hard copies for those who have no access to the Orb and are accessible to all colleagues in different format more people will have awareness of their rights within the workplace.</p> <p>The revised Violence at Work Policy will include employee on employee incidents, and may provide another mechanism for reporting domestic abuse, where partners both work for the Council, and appropriate support can be put in place.</p> <p>The Staff Networks have been engaged on some of the key policies for their lived experience / insight in development.</p> <p>Policies will focus on positive, open conversations with line management. Through these policies we hope to create an environment where people feel safe and able to raise concerns and potential risks knowing that they will be supported and heard but also raise awareness among other colleagues of the impact of behaviours.</p>	<p>Staff Groups</p>
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<p>Colleagues will know what their rights and responsibilities are within the Council as well as the mechanisms through which to raise concerns on behaviours.</p> <p>All colleagues have rights under each of the policies to be supported by Trade Unions and colleagues and encourage parity and equality in approach.</p> <p>Through all our policies we promote the health and wellbeing of our colleagues, particularly within the new Alcohol and Drugs Policy which focusses on support and guidance for colleagues who may experience difficulties with substance misuse.</p> <p>Negative Colleagues in a same sex relationship may be 'outed' inadvertently through the formal recording of relationships. Considerations have to be given to handling this information sensitively and confidentially.</p> <p>Colleagues on prescription medication may be negatively impacted by the implementation of the Alcohol & Drugs policy. Colleagues with underlying health conditions or disabilities who are on medication will need the policy to be clear about prescription medication</p>	
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<p>Environment and Sustainability including climate change emissions and impacts</p> <p>Positive None identified</p> <p>Negative None identified</p>	<p>Affected populations</p>
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<p>Economic</p> <p>Positive Ensure that policies include information about support services available and where this information can be found.</p> <p>Positive impact on improving working conditions by ensuring safety from unprofessional/illegal conduct at work.</p>	<p>Affected populations</p> <p>Staff Groups</p>
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Negative None identified	
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9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

Not applicable.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

Policies are covered by internal colleagues only who should be of legal working age. Where children are involved in investigations, there is dedicated guidance for Nominated and Investigating Officers on how to engage these situations.

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a [Strategic Environmental Assessment](#) (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

Not applicable.

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Ensuring Code of Conduct has links to Council’s Domestic Abuse Policy and onus on is both parties to declare relationship	ER Team	For TU consultation	01/05/2023

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Provide clear guidance to managers on handling sensitive relationship declarations	ER Team	For TU consultation	01/05/2023
Alcohol & Drugs Policy to be clear about prescription medication	ER Team	For TU consultation	01/03/2023
All policies should highlight support services available including Trade Unions, EAP, counselling, specialist services as well as other relevant policies	ER Team	For TU consultation	01/07/2023

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No.

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

We will be able to report on activity within the Code of Conduct (recorded relationships), Disciplinary and Grievance policy through information held on Halo / iTrent.

Information will also now be held within SHE which will allow for prejudice based incidents to be monitored by the appropriate HR teams.

16. Sign off by Head of Service

Name MARGARET-ANN LOVE

Date 20/03/2024

17. Publication

Completed and signed IIAs should be sent to:

integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care

sarah.bryson@edinburgh.gov.uk to be published at www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/