Policy Development/Review – 

Pilot Equality Impact Assessment Form

EXAMPLE OF COMPLETED EIA ON ILLUSTRATIVE POLICY

*Equality Impact Assessment (EIA) is a systematic and evidence-based process which verifies that the University’s policies and practices are non-discriminatory, and are fair and inclusive in meeting the legitimate needs of the diverse groups that make up the University community. The key purpose of the Pilot Form and Toolkit is to help identify any Equality, Diversity and Inclusion (EDI) impact (positive or negative) associated with new or updated policies, along with any potential discrimination or gaps in policy development.*

*This form should be completed, in conjunction with the EIA Toolkit Guidelines, and submitted for approval to the relevant governance body in advance of any policy development or major review of existing policy. Equality impacts should continue to be considered throughout the policy drafting process (please see EIA Toolkit Guidelines for details) and the final Equality Impact Assessment Form (with revisions, if required under Outcomes 1-4 below) should be submitted again with the final policy for approval by the relevant governing body.*

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| Policy title: | Company Name Dress Code |
| Policy developer/reviewer: | ABCD |
| Policy owner: | ABCD |
| Approval pathway: | 1. Committee on XYZ
2. Company Management Team
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| Proposed Policy Committee Approval Dates | * 1. Committee on XYZ, 19 April 2017
	2. Company Management Team, 27 April 2017
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| Proposed effective date: | 1 September 2017 |
| Date of latest review if applicable: | N/A |

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| EIA Date: | 29 February 2017 |
| Membership of Policy Group (including EDI Group member):ABCD (EDI member) |

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| Scope of Policy: The policy applies to all members of Company Name staff who are not on the Company Name Management Team. The policy will also apply to all members of temporary or contract staff employed on any basis by Company Name. |
| Policy Development Phase:  |  |  |
| * Proposed new policy
 | X |  |
| * Undertaking a review of an existing policy
 |  |  |
| * Other (please state):
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| Please identify any opportunity to promote Equality, Diversity and Inclusion in the University or any potential adverse impact that the development of this policy could have, on any of the equality grounds identified below. |
| **Equality Ground** | **Identified Impact** |
| Race | The following requirements could have a significant negative impact on racial grounds:* “Male employees must be clean-shaven with short hair”.

Daily shaving can cause significant skin issues for black men. * “… tattoos … may result in suspension and termination of employment.”

Tattoos are an important element of some cultures, for example Maori/Polynesian. |
| Disability | The following requirements could have a significant negative impact on disability grounds:* “Male employees must be clean-shaven with short hair”.

Daily shaving can cause significant skin issues for some men. * “Artificial hair colours . . . may result in suspension and termination of employment.”

For members of staff recovering from illness, prohibition of artificial hair colours may cause distress. * “Male employees … Jewellery is strictly prohibited – only watches and wedding rings may be work”

For employees who require medical alert bracelets or other medical devices this may cause hardship.* “Female employees must wear make-up . . .”

Make-up can cause significant skin issues. * “Female employees . . . hair should be no shorter than shoulder-length . . .”

For members of staff recovering from illness/treatment this could have a negative impact.* “Female employees . . .shoes with a 2 to 4 inch heel”

This requirement could have a negative impact on those with visible and invisible disabilities. * “…offensive perfumes and body odour…”

Some illnesses can affect body odour – this statement could negatively impact on some.  |
| Gender (including gender identity)  | The following requirements could have a significant negative impact on gender grounds:* Gender references and pronouns only relate to male and female only.
* The inclusion of prescriptive directives regarding clothing and grooming for male/female genders could have a significant impact on any member of staff whose gender identity does not fall within traditional male/female parameters or who identifies as a different gender to the one assigned at birth.
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| Age | The following requirements could have a significant negative impact on age grounds:* “Male employees must be clean-shaven with short-hair.”
* “Artificial hair colours, tattoos and piercings . . .”

Both of the above statements could have a negative impact to both older and younger members of staff e.g. some may colour grey hair and current social norms mean that many younger people have longer hair, beards, tattoos and piercings.  |
| Sexual Orientation | The following requirements could have a significant negative impact on sexual orientation grounds:* The inclusion of prescriptive directives regarding traditionally defined ‘feminine’ clothing and ‘high heels’ could have a negative impact on members of staff who do not choose to dress in a traditionally feminine style including lesbian women.
* The references to ‘husbands/wives’ could have a negative impact on members of staff who are in same-sex/long-term relationships/civil partnerships and who are prohibited from or have not married.
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| Religion | The following requirements could have a significant negative impact on racial grounds:* “Male employees must be clean-shaven with short hair.”

This could have a negative impact on a number of people of different faiths e.g. observant Muslim men cannot be clean-shaven and Sikh men cannot cut their hair. * “Female employees must wear make-up (foundation, eye shadow, light-coloured lipstick) on all occasions … Hair should be no shorter than shoulder-length and worn down at all times.”

This could have a negative impact on a number of people of different faiths e.g. observant Muslim /Jewish women are expected to wear hair coverings. Make-up is not acceptable in some religions. * The clothing guideline set out for female employees include over the knee, fitted clothing, high heels and prohibit scarves.

This could have a negative impact on a number of people of different faiths e.g. observant Muslim /Jewish women are expected to wear hair coverings and less revealing clothing.  |
| Civil Status | The following requirements could have a significant negative impact on civil status grounds:* “Male employees … Jewellery is strictly prohibited – only watches and wedding rings may be work”

The requirement that only wedding rings may be worn could have a negative impact on members of staff who are in same-sex/long-term relationships/civil partnerships and who are prohibited from or have not married. * The reference to husbands/wives attending company social occasions could have a negative impact on members of staff who are in same-sex/long-term relationships/civil partnerships and who are prohibited from or have not married.
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| Family Status | * “Female employees must wear make-up . . .”
* “Female employees . . . hair should be no shorter than shoulder-length . . .”
* “Female employees . . .shoes with a 2 to 4 inch heel”

Caring responsibilities have a significant gender difference with woman more often having such responsibilities with associated time poverty. Such prescriptive dress requirements, in particular the restriction on hair length, may discriminate against these employees.  |
| Membership of the Travelling Community | * The clothing guideline set out for female employees include over the knee, fitted clothing, high heels and prohibit scarves.

This could have a negative impact on women from the Travelling Community as there is a cultural norm that less revealing clothing is worn.   |
| **Other Considerations** |
| Socio-economic Status | The following requirements could have a significant negative impact on socio-economic status.* A possible negative impact exists in respect of a difference in treatment of full-time employees and hourly paid staff in that one group will be paid if asked to leave the premises to change clothes etc. while the other group will not.
* “The policy applies to all members of Company Name staff who are not on the Company Name Management Team.”

Difference in status and earnings between members of the management team and other members of staff could be exacerbated by not applying this policy to all staff.* “The policy will also apply to all members of temporary or contract staff employed on any basis by Company Name.”

Difference in status and earnings between temporary and contract members of staff and full-time employees could be highlighted by the application of this policy. |
| Select one of the four outcomes below to indicate how the development/review of the policy will be progressed and state the rationale for the decision.  |
| Outcome 1:  | No change required – the assessment is that the policy is/will be robust and/or  |  |  |
|  | promotes Equality, Diversity and Inclusion in the University. |  |  |
| Outcome 2:  | Adjust the policy – this involves taking steps to address any adverse impacts |  |  |
|  | before the policy has been developed. |  |  |
| *Outline these steps:* |
| Outcome 3:  | Continue the policy while mitigating against any potential adverse impacts. | X |  |
| *Outline how these adverse impacts can be mitigated against:*Further to issues identified in the EIA conducted on the Policy Proposal on 10 February 2017, there are a number of potential equality issues identified that have not been addressed in the development of this proposal. **It is strongly advised that the policy be redrafted to address those issues:*** 1. The proposed policy does not apply to members of Company Name management team – differentiating between Management Team and staff could have a negative impact. This could be mitigated by amending the policy so that it applies to all staff including the management team.
	2. There is a lack of clarity about whether it is expected that the same policy will be in effect in each unit within the company as it would appear that heads of individual units may determine individual guidelines for their areas – this could result in the policy being applied in an inconsistent manner and may result in inequality of treatment for different members of staff. This could be mitigated by developing standard policies and processes that must be adhered to by all units within the company.
	3. Care should be taken to ensure that the guidance material outlined in the supporting documents section is accessible for all.
	4. The relevant legislation, statutes and policies should be clearly identified.
1. The introduction of wider consultation would facilitate identification of equality issues for staff, including those identified under the 10 categories set out in the guidelines, and allow those issues to be addressed before the policy is introduced.
2. In respect of the specific phrases/sections of the draft policy that impact on the categories of staff identified above , the Draft Policy should be re-drafted, taking cognisance of the following recommendations, as well as the guidance set out above:
	1. References to male and female should be removed – staff should be referred to as ‘employees’ or ‘staff’.
	2. Gender-specific pronouns should be replaced by ‘they’, ‘their’ etc
	3. The grooming requirements should be redrafted.
	4. Definitions for business attire should be re-drafted.
	5. The lists of appropriate and inappropriate clothing should be reviewed and not broken down by gender.
	6. References to non-company-employees should be removed.
	7. Reasonable accommodations should be applied to more than religious beliefs and limitations regarding societal expectations should be deleted.
	8. Clarity regarding how ‘offensive perfumes and body odours’ is defined and how such a definition is to be applied should be added.
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| Outcome 4:  | Stop the policy or practice, as there are adverse effects which cannot be |  |  |
|  | prevented or mitigated against. |  |  |
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| In case of option 2 or option 3, if policy adjustment or mitigation is required, please indicate recommended timeframe before policy requires a further EIA review to ensure it is non-discriminatory and upholds UCD’s public sector equality duty. | The final draft version of this policy should undergo an EIA in advance of submission to any of the relevant approval bodies. |

The form should be signed by the Chair of the Policy Development/Review Group:

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| Chair |