

## Equality Impact Assessment (EIA) (v4.0)

Legislation requires that our policy documents consider the potential to affect groups differently and eliminate or minimise this where possible. This process helps to address inequalities by identifying steps that can be taken to ensure equal access, experience and outcomes for all groups of people.

### Step One – Policy Definition

<b>Function/policy name and number:</b>	Grievance Policy
<b>Main aims and intended outcomes of the function/policy:</b>	The Dudley People Plan sets out our overall direction for how we support our people, with our ultimate objective to make Dudley Group Foundation Trust (DGFT) a place where people want to work and thrive at work. This is achieved through ensuring that our people are looked after and supported and work in a culture where we treat each other with dignity and respect.
<b>How will the function/policy be put into practice?</b>	Policy soft launch, followed by more in depth training for managers
<b>Who will be affected/benefit from the policy?</b>	Staff Employed by the Trust – excludes contractors, Agency and Bank Workers
<b>State type of document</b>	Policy
<b>Is an EA required?</b> NB :Most policies/functions will require an EA with few exceptions such as routine procedures-see guidance attached	Yes
<b>Accountable Director:</b> (Job Title)	Chief People Officer
<b>Assessment Carried out by:</b>	Head of People
<b>Date Completed:</b>	26 February 2025

To help you to determine the impact of a strategy or policy, think about how it relates to the Public Sector Equality Duty, the key questions as listed below and prompts for each protected characteristic are included Step 3:

- Eliminate unlawful discrimination, victimisation, and harassment
- Advancing equality of opportunity
- Fostering good community relations

#### KEY QUESTIONS

- Are people with protected characteristics likely to be affected differently even though the policy is the same for everyone?
- Could there be issues around access, differences in how a policy is experienced and whether outcomes vary across groups?
- What information /data or experience can you draw on to indicate either positive or negative impact on different groups of people in relation to implementing this function policy?

## Step Two – Evidence & Engagement

<p>What evidence have you identified and considered? This can include research ((national, regional ,local) surveys, reports, NICE guidelines, focus groups, pilot activity evaluations, clinical experts or working groups, information about Dudley’s demographics, The Dudley Group equality and diversity reports, Joint Strategic Needs Assessment (JSNA) or other equality analyses, Workforce Race and Disability Equality data, anecdotal evidence.</p>		
<b><u>Research/Publications</u></b>	<b><u>Working Groups</u></b>	<b><u>Clinical Experts</u></b>
<p>Legislation.gov.uk Employment Act 2008  <a href="https://www.legislation.gov.uk/ukpga/2008/24/contents">https://www.legislation.gov.uk/ukpga/2008/24/contents</a></p> <p>NHS England (2020) <a href="#">NHS England » Our NHS People Promise</a></p> <p>Advisory, Conciliation and Arbitration Service (ACAS) (2024) 06<a href="https://www.acas.org.uk/grievance-procedure-step-by-step">https://www.acas.org.uk/grievance-procedure-step-by-step</a></p> <p>Advisory, Conciliation and Arbitration Service (ACAS) (2015) <a href="#">Acas Code of Practice on disciplinary and grievance procedures   Acas</a></p> <p>Internal WRES, WDES, EDS, PSED and other EDI publications <a href="#">Equality, Diversity, and Inclusion - The Dudley Group NHS Foundation Trust</a></p>	<p>Staff Representative Committee</p> <p>Joint Local Negotiating Committee</p> <p>Joint Negotiating Committee</p>	<p>n/a</p>
<p>Engagement, Involvement and Consultation:</p> <p>If relevant, please state what engagement activity has been undertaken and the date and with which protected groups:</p>		
<b>Engagement Activity</b>	<b>Protected Characteristic/ Group/ Community</b>	<b>Date</b>
<p>Staff Networks – EMBRACE, LGBTQ+, Women’s, Disability</p>	<p>Ethnicity, Gender, Gender Reassignment, Sexuality, Religion or Beliefs, Maternity and</p>	<p>January 2025</p>

	Pregnancy, Marital Status Disability	
For each engagement activity, please state the key feedback you have received and then use this in step 3. List a summary of the Feedback in the 'list of feedback received' column, then add your mitigation and then your action to address.		

**Summary of the feedback:**

<p>I think it is important to include examples of potential consequences to the person that has been proven to have bullied/harassed staff.</p> <p>This will help manage the expectations of the person raising the grievance, so that in the event that their grievance is upheld they know what the consequence will be.</p> <p>Examples might also help deter people from bullying and harassment of others, as it is a reminder of the consequences of their actions.</p> <p>It is a huge step to formally raise a grievance and people need assurance that the outcome will be proportionate to what they have experienced.</p>
<ol style="list-style-type: none"> <li>1. Is it possible to add a link of the grievance form to the grievance policy?</li> <li>2. It is quite good that training and support is added to the policies.</li> <li>3. Separating the policies has helped in streamlining and better understanding.</li> </ol>
<p>The formatting on all of these seems very good and easy to navigate. It's easy to understand with any technical terms I noticed explained. I liked the way it was broken down. It made it feel undaunting and easy to read.</p> <p>I don't really have any changes I would make except a couple of typos I noticed:</p> <p>Anti Bullying Anti Discrimination:</p> <ul style="list-style-type: none"> <li>• "In sexual misconduct cases where there is no time limit." -&gt; "In sexual misconduct cases there is no time limit."</li> </ul> <p>Guidance:</p> <ul style="list-style-type: none"> <li>• The header "Informing an employee, they are under investigation" -&gt; "Informing an employee they are under investigation"</li> </ul>
<p>These look great, thank you. I particularly like the one on conducting an investigation, this would have been most helpful when I led one last year!!</p>

## Step Three – Assessment of Impact

Complete **relevant** boxes below to help you record your assessment

Consider information and evidence from previous section covering:

- Engagement activities
- Equalities monitoring data
- Wider research

**Also, consider due regard under the general equality duty, NHS Constitution and Human Rights.**

Positive Impact HIGH MEDIUM LOW	Negative Impact HIGH MEDIUM LOW	Neutral Impact Cross in the box if no impact is identified	<ul style="list-style-type: none"> <li>• List concerns raised for possible negative impact</li> <li>OR</li> <li>• List beneficial impact</li> </ul> (utilise information gathered during assessment)	Mitigation  List actions to redress concerns raised if a negative impact has been identified in the previous column	Lead [Job title]	Time-scale	How are actions going to be monitored/reviewed/reported? (incl. after implementation)
Positive OR Negative Impact (not both)							
<b>1) Age</b> Describe age related impact and evidence. This can include safeguarding, consent and welfare issues:							
X			Nationally, people of certain age groups are, on balance, at a greater risk of experiencing Age discrimination.	New policy framework allows for easier access to the policy, clear mechanisms to seek support and raise a grievance and a clear framework for swift resolution.  This policy-associated toolkit, resources, and training are expected to positively impact the support of staff from particular age groups in raising grievances.	Head of People, Head of EDI	Completed	Data collected via case tracker & report published annually to monitor performance

				<p>The policy stipulates diverse decision-making panels</p> <p>The training on the policy will raise awareness of inequality data for the protected characteristics</p>		Throughout 2025	
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**2) Disability**  
Describe disability related impact and evidence. This can include attitudinal, physical, communication and social barriers as well as mental health/ learning disabilities, cognitive impairments:

<b>X</b>			<p>Our casework, staff survey and WDES data shows us that disabled staff are more likely to experience cause to raise a grievance.</p> <p>The percentage of staff who experienced harassment, bullying or abuse from managers in the last 12 months was significantly higher for disabled staff, 15.9%, than for non-disabled staff, 8.6%. Both disabled men and women were more likely to experience experienced harassment, bullying or abuse from managers.</p> <p>We recognise that grievance procedures may exacerbate mental health issues.</p>	<p>New policy framework allows for easier access to the policy, clear mechanisms to seek support and raise a grievance and a clear framework for swift resolution. Reasonable adjustments specifically mentioned for disabled employees.</p> <p>Mitigation measures including the Employee Assistance Programme (EPA) and support from Wellbeing is offered to alleviate additional stress arising from the grievance process for those raising the grievance and those subject to the grievance.</p> <p>The Trust has a well-established Disability Staff Network group. Our employee networks offer help,</p>	Head of People, Head of EDI	Completed	Data collected via case tracker & report published annually to monitor performance
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				<p>advice and support in a friendly and safe environment. The networks help us remove any barriers to employment, service delivery and help us promote equality, diversity and inclusion.</p> <p>The policy stipulates diverse decision-making panels</p> <p>The training on the policy will raise awareness of inequality data for the protected characteristics</p>		Throughout 2025	
<b>3) Gender re-assignment</b> Describe any impact and evidence on transgender people. This can include issues such as privacy of data and harassment:							
X			<p>National datasets suggests that people from this group are more susceptible to victimisation from other staff and therefore feel less able to raise a grievance.</p>	<p>New policy framework allows for easier access to the policy, clear mechanisms to seek support and raise reports and a clear framework for both informal and formal resolution.</p> <p>Mitigation measures including the Employee Assistance Programme (EPA) and support from Wellbeing is offered to alleviate additional stress arising from the grievance process for those raising the grievance and</p>			<p>Data collected via case tracker &amp; report published annually to monitor performance</p>



X			<p>Our casework, staff survey and WRES data shows us that Global Majority staff are more likely to have cause to raise a grievance.</p> <p>These statistics show how important it is to have a robust Grievance policy in place</p>	<p>New policy framework allows for easier access to the policy, clear mechanisms to seek support and raise a grievance and a clear framework for swift resolution. The policy stipulates diverse decision-making panels</p> <p>The training on the policy will raise awareness of inequality data for the protected characteristics</p>	Head of People, Head of EDI	<p>Completed</p> <p>Throughout 2025</p>	Data collected via case tracker & report published annually to monitor performance
<b>7) Religion or Belief</b>							
Describe any religion, belief or no belief impact and evidence. This can include dietary needs, consent and end of life issues:							
X			<p>Our casework, staff survey and WRES data shows us that Global Majority staff are more likely to have cause to raise a grievance.</p>	<p>New policy framework allows for easier access to the policy, clear mechanisms to seek support and raise a grievance and a clear framework for swift resolution.</p>	Head of People, Head of EDI	Completed	Data collected via case tracker & report published annually to monitor performance
<b>8) Sex</b>							
Describe any impact and evidence on men and women. This could include access to services and employment:							
X				<p>New policy framework allows for easier access to the policy, clear mechanisms to seek support and raise reports and a clear framework for both informal and formal resolution</p> <p>The policy stipulates diverse decision-making panels</p>			Data collected via case tracker & report published annually to monitor performance





**11) Privacy, dignity, respect, fairness etc.**

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# **EQUALITY IMPACT ASSESSMENT (EIA) -** **GUIDANCE NOTES**

An equality impact assessment (EIA) ensures that issues of equality, diversity, and inclusion are considered when developing or revising strategies, policies, or proposals that affect the delivery of services and the employment practice of the Trust.

## **Why should we carry out an EIA?**

We are required to carry out equality impact assessments because:

- There is a legal requirement to do so in relation to the protected characteristics
- They help identify gaps and making improvements to services
- They help avoid continuing or adopting harmful policies or procedures
- They help you to make better decisions
- They will help you to identify how you can make your services more accessible and appropriate
- They enable the Trust to become a better employer

## **Equality Impact Assessments help us to:**

- Determine how Trust strategy, policies and practice, or new proposals, will impact or affect different community groups, especially those groups or communities who experience inequality, discrimination, social exclusion or disadvantage.
- Measure whether strategies, policies or proposals will have a negative, neutral, or positive effect on different communities.
- Make decisions about current and future services and practice in fuller knowledge and understanding of the possible outcomes for different communities or customer groups.

## **What do we need to assess?**

Trust policies are subject to a 3-year review. Alongside the reviews, new policies will emerge. Most policies, strategies, and business plans will need an EIA.

However, EIAs are not required for changes in routine procedures, administrative processes, or initiatives that will not have a material impact on staff, patients, carers, and the wider community. Examples include checking the temperature of fridges, highly technical clinical procedures, office moves, etc.

## **DGFT Process for EIAs**

The revised EIA process is a single-stage process carried out in three steps

### **Step One: Policy Definition**

This involves a description of the policy details. This is the fact-finding stage where you gather as much information about the strategy, policy or function you intend to assess. Who will be using the service, policy or function and the outcomes you want to achieve. It is important to make sure that your service, policy or function has clear aims and objectives.

## **Step Two: Evidence and Engagement**

EIAs should be underpinned by sound data and information. This should be sought from various sources:

- The knowledge and experience of the people assisting in the service.
- ONS local demography/ Census data: [Census Maps - Census 2021 data interactive, ONS](#)
- Service monitoring reports / Divisional reports
- Patient satisfaction surveys
- Workforce monitoring reports
- Complaints and comments
- Outcome of consultation exercises
- Feedback from focus groups
- Feedback from organisations representing the interests of key target groups
- National and local statistics and audits [Joint Strategic Needs Assessment - All About Dudley Borough](#)
- Academic, qualitative and quantitative research
- Ward/ Divisional reviews
- Anecdotal data

This stage allows you to identify whether your strategy, policy or function has a positive or negative or potential negative impact on the protected characteristics. In some cases, an initial EIA is all you will need to establish whether you are providing equal outcomes for staff or patients. If you receive no feedback or concerns, you can mark each characteristic in section 3 as a neutral impact.

## **Step Three: Assessment of Impact**

This is the main and the most important part of the EIA.

To help you determine the impact of the strategy or policy, consider how it relates to the Public Sector Equality Duty. The key questions and prompts for each protected characteristic are listed below.

- Eliminate unlawful discrimination, victimisation, and harassment
- Advancing equality of opportunity
- Fostering good community relations

The real value of completing an EIA comes from the actions that will take place and the positive changes that will emerge through conducting the assessment. To ensure

that the action plan is more than just a list of proposals and good intentions, the following should be included:

- Each action be attributed to a key person who is responsible for its completion
- An achievable timescale that is also at the same time reasonable
- Relevant and appropriate activities and progress milestones
- How the action will be monitored/reviewed

## **KEY QUESTIONS**

- What information /data or experience can you draw on to indicate either a positive or negative impact on different groups of people with implementing this function policy
- Are people with protected characteristics likely to be affected differently even though the policy is the same for everyone?
- Could there be issues around access, differences in how a service or policy is experienced and produces outcomes that vary across different groups
- Does the policy relate to the Trust's equality objectives?

NB It is important that mitigation measures be identified and acted upon where an adverse impact is known or likely.

## **Step Four: Assurance**

This section enables the EIA to be signed off by a head of or director for the area. This will provide assurance to the equalities team that the EIA has been thoroughly and thoughtfully conducted.

## **Help & Support:**

The equalities team will provide advice and support throughout the EIA process. Once you have completed your EIA, you must submit these documents to the procedural documents team, who will then ask the equalities team to sign off on the final version of the form.

For training, guidance and resources, including completed example forms, please visit the equality, diversity and inclusion hub pages: [Equality, Diversity & Inclusion - Policies and Guidelines](#).

## **Copies of the EIA:**

The manager who completed the strategy or policy review should keep copies of the form to be monitored/revisited at the following policy review. Procedural documents will also keep a copy on file. All EIA will then be published on our external web pages to demonstrate due regard for the Public Sector Equality Duty.