

Equality Impact Assessment (EqIA) for Policies, Procedures and Services

Proposal name	Code of Conduct for Employees / Workers		
Directorate	Resources & Transformation		
Service	HR Strategy & Planning		
Responsible Officer	Nicola Rickhuss / Rebecca Lloyd		
Proposal planning start	July 2021	Proposal start date (due or actual date)	February 2022

1	What is the purpose of the proposal?	Yes / No	New / revision
	Policy	Yes	Revision
	Procedure	No	N/A
	Guidance	No	N/A
	Is this a service to customers/staff/public?	No	N/A
	If yes, is it contracted or commissioned?	No	N/A
	Other - give details	N/A	N/A
2	What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change?		
	<p>The purpose of the Code of Conduct is to set the standards for Council employees to demonstrate honesty and integrity and ensure that employees act in the best possible interests of the public. It sets out clear responsibilities for all employees and is linked to a number of policies and procedures.</p> <p>The Code of Conduct is a key element of our employment practices and it is vital that it meets the needs of employees, managers and the general public. To provide a Code of Conduct which is free from any form of discrimination is a key aim of Human Resources (HR).</p> <p>The Code of Conduct was last reviewed in 2019 and there have been a number of new policies and procedures since this date which impact on the code of conduct including ways of working (agile/blended working approaches), menopause, gender reassignment, and domestic abuse guidance. Further changes/clarification of the policy are from audit/manager recommendations in relation to GDPR and financial declarations of interest.</p> <p>Overall the main changes to the policy are:</p> <ul style="list-style-type: none"> • Scope changed to include workers (casuals and temporary agency workers) as well as employees.(title and scope 2.1) • Accountabilities (section 4.0) updated. Clarifying the requirement to complete a declaration of interest form and strengthening the adherence to GDPR and 		



	<p>disclosure.</p> <ul style="list-style-type: none"> • Dress code updated remote/blended working (5.2.4) • Equalities updated to equalities, diversity and inclusion and zero tolerance to discrimination (5.2.5) • Mobile phone section updated – official council business only.(5.4.2) • Any financial or non-financial interest should be declared using declaration of interest form sign by the employees line manager, and authorised by the Executive Director and council's monitoring officer • Inserted section 5.5.7 inappropriate access to information. 		
3	Who is the proposal likely to affect?		
	People in Walsall	Yes / No	Detail
	All	No	The Code of Conduct applies to all council employees and workers including those on a casual working agreement and on a temporary agency assignment.
	Specific group/s	No	
	Council employees	Yes	
	Other (identify)	Yes (Workers)	
4	Please provide service data relating to this proposal on your customer's protected characteristics.		
	<p>As of 31 March 2021 the total number of Walsall Council employees (excluding Schools) were 3079.</p> <p>The Council's workforce is made up of 67.55% females. 22.22% of the workforce are classified as under-represented ethnic groups (i.e. those excluding White British ethnicity). In total there were 137 employees (4.45% of the workforce) who declared they had a disability, as defined by the Equality Act 2010.</p> <p>Of Walsall Council employees 3.12% are in the age group under 25, 24.42% in age group 25-39, 25.43% are in the age group 40-49, 43.30% are in the age group 50-64, and 3.73% are in the age group 65 and over.</p>		
5	Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).		
	<p>Specialist areas within the council were consulted at the drafting stage to ensure that standards and details within the code of conduct were in line with current protocols. Managers who were consulted at this stage included Finance, Legal, Communications and Information Governance.</p> <p>The draft Code of Conduct was consulted on with the Senior Managers Group across the council and Trade Unions between the 02/11/21 and 25/11/21.</p> <p>Feedback from senior manager led to a number of minor changes / clarification of wording.</p> <p>Trade union colleague's recommendations have been incorporated into both the Code of Conduct where applicable.</p>		

The policy will be submitted to CMT on 06/01/22 followed by Personnel Committee for approval on 24/01/2022.

Notification of the launch of the new Code of Conduct will be publicised on Inside Walsall, and managers will be asked to cascade it to employees / workers, especially those without access to the intranet. HR Business Partners will remind managers at their relevant DMT meetings.

Consultation Activity.

Type of engagement/consultation	Consultation with wider council via email	Date	02/11/21 to 25/11/21
Who attended/participated?	The Senior Managers Group, Information Governance, Finance, Legal and HR,		
Protected characteristics of participants	A range of protected characteristics including, gender, race, age, disability.		
Feedback <ul style="list-style-type: none">• Further information or clarification of wording, which is detailed in other HR policies.• Amendment of wording to aid understanding.			

Type of engagement/consultation	Consultation with Trade Unions via email and briefed at ERF.	Date	02/11/21 to 25/11/21
Who attended/participated?	Trade Unions representatives (Unison, GMB and UNITE, as well as the Teachers Associations – NEU and NASUWT)		
Protected characteristics of participants	A range of protected characteristics including, gender, race, age, disability.		
Feedback <ul style="list-style-type: none">• On how the code of conduct applies to TU branch officers.• Declaring all personal calls on council mobile is unreasonable.• Commitment to equal opportunity and having a diverse workforce at all levels.• Signposting to the code of conduct for councillors.• Amendment of wording for clarification and to aid understanding.			

6 Concise overview of all evidence, engagement and consultation

	Formal consultation with senior managers across the council and trade unions raised no concerns in relation to protected characteristics and the proposed changes to the policy.		
7	How may the proposal affect each protected characteristic or group? The effect may be positive, negative, neutral or not known. Give reasons and if action is needed.		
	Characteristic	Affect	Reason Action needed Yes / No
	Age	Neutral	The policy applies to all employees – no impact foreseen. No
	Disability	Negative	Potential impact on employees who require reasonable adjustments for communication who do not understand the policy e.g. employees with learning disabilities. Yes
	Gender reassignment	Neutral	The policy applies to all employees – no impact foreseen No
	Marriage and civil partnership	Neutral	The policy applies to all employees – no impact foreseen No
	Pregnancy and maternity	Negative	Potential impact for people who are on maternity or paternity leave and are not updated about the revised policy. Yes
	Race	Negative	Potential impact on employees where English is not their first language as they may not understand the policy. Yes
	Religion or belief	Neutral	The policy applies to all employees – no impact foreseen No

	Sex	Neutral	The policy applies to all employees – no impact foreseen	No
	Sexual orientation	Neutral	The policy applies to all employees – no impact foreseen	No
	Other (give detail)	N/A		
	Further information			
8	Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details.			(Delete one) No
9	Which justifiable action does the evidence, engagement and consultation feedback suggest you take?			
	A	No major change required		
	B	Adjustments needed to remove barriers or to better promote equality		
	C	Continue despite possible adverse impact		
	D	Stop and rethink your proposal		

Action and monitoring plan				
Action Date	Action	Responsibility	Outcome Date	Outcome
Day of launch	The policy to be explained/made available to all employees / workers (including those on maternity / paternity leave and long term absence).	Employee's line manager should make themselves available to explain the policy to ensure understanding and offer support to allow individuals to achieve the requirements.	As and when required	
Day of launch	The policy to be explained/made available in other languages on request for employees whose first language is not English.	Appropriate liaison as required with the council's Interpretation, Translation, Transcription and Easy Read (ITTE) service provider.	As and when required	
Day of	Alternative formats	Liaison as required with	As and	

launch	(audio and Easy Read) for disabled employees to be made available on request.	the appropriate council procured services; audio formats from Walsall Society for the Blind and Easy Read from the Community, Equality and Cohesion team.	when required	

Update to EqIA	
Date	Detail

Contact us

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Inside Walsall: http://int.walsall.gov.uk/Service_information/Equality_and_diversity