

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

<b>Proposal name</b>	<b>Neurodiversity Policy</b>		
<b>Directorate</b>	Resources and Transformation		
<b>Service</b>	HR Strategy and Planning Team		
<b>Responsible Officer</b>	Hannah Hewston-Jones		
<b>Proposal planning start</b>	02/01/2024	<b>Proposal start date (due or actual date)</b>	01/04/2024

1	What is the purpose of the proposal?	Yes / No	New / revision
	Policy	Yes	New
	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?		
	Other - give details		
2	<b>What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change?</b>		
	<p>The purpose of this policy is to raise awareness of neurodiversity amongst staff to be able to recognise and support colleagues, customers, members and partners. The council is committed to building a diverse and inclusive workplace for our employees, workers, customers and partners who work with the Council. Providing support and guidance to those who are or who believe they are neurodivergent and have specific needs is an important aspect of our overall commitment to equality, diversity and inclusion as well as looking after both the physical and psychological health and well-being of all our employees / workers.</p> <p>Research shows it is estimated that around 1 in 7 people (more than 15% of people in the UK) are neurodivergent, meaning that the brain functions, learns and processes information differently. Neurodivergence includes a range of conditions including Attention Deficit Disorders, Autism, Dyslexia and Dyspraxia (this list is not exhaustive).</p> <p>The National Autistic Society report at least 700,000 autistic adults in the UK of which only 15% are in employment.</p> <p>According to the British Dyslexia Association, the number of individuals with dyslexia in the UK is around 10%, with 4% of the population at the severe end of the dyslexia continuum.</p>		

	<p>This policy is intended to help foster a supportive environment, where employees / workers and managers are knowledgeable and encouraged to be comfortable enough to have open conversations about neurodiversity without embarrassment and fear of shame or stigma. The policy along with the guidance document provides suggestions for self-management, signposts to relevant sources of advice, information, support and provides guidance on reasonable adjustments that should be considered.</p> <p>The policy has been aligned with other HR policies around PROUD and the Behaviour Framework.</p>		
3	<b>Who is the proposal likely to affect?</b>		
	<b>People in Walsall</b>	<b>Yes / No</b>	<b>Detail</b>
	<b>All</b>	No	<p>This policy applies to all council employees (including Directors, Executive Directors, the Chief Executive, fixed term and temporary employees as well as casual and agency workers (where applicable)). It applies to contractors, consultants or any self-employed individuals working for the council.</p> <p>This policy applies to all potential and existing employees who are neurodivergent, or believe they may be neurodivergent.</p> <p>The policy does not apply to school – based employees / workers where the governing body has delegated authority and for whom separate arrangements apply.</p>
	<b>Specific group/s</b>	No	
	<b>Council employees</b>	Yes	
	<b>Other (identify)</b>		
4	<b>Please provide service data relating to this proposal on your customer's protected characteristics.</b>		
	<p>As of 31 March 2023 the total number of Walsall Council employees (excluding Schools) were 3015. The Council's workforce is made up of 67.23% females. 24.65% of the workforce are classified as minority ethnic. In total there were 161 employees (5.34% of the workforce) who declared they had a disability, as defined by the Equality Act 2010. 3.35% of the workforce are under 25 years of age, 33.2% of the workforce are 55 years or older, 55-59 years old are the largest age group making up 16.65% of the workforce.</p>		
5	<b>Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).</b>		

Informal consultation commenced on 12/05/2023 to 30/05/2023 with HR Ops and HR Strategy & Planning teams and also the Neurodiversity working group.

Formal consultation commenced 01/11/2023 to 22/11/2023 with Assistant Directors, Heads of Service, and stakeholders who have a specific interest/involvement with the policy.

Trade Unions were consulted at the same time.

### Consultation Activity

<b>Type of engagement/consultation</b>	Informal consultation with key stakeholders	<b>Date</b>	12/05/2023 to 30/05/2023
<b>Who attended/participated?</b>	HR Ops & HR Strategy and Planning teams and also the Neurodiversity working group		
<b>Protected characteristics of participants</b>	A range of protected characteristics including, gender, race, age, disability.		
<p><b>Feedback</b></p> <p>As part of the initial/informal consultation, the new policy was shared with key stakeholders – HR Ops &amp; Strategy &amp; Planning colleagues via email and followed up by meeting and shared the policy via MS teams with the Neurodiversity working group, welcoming feedback, comments, suggestions and improvements to ensure the draft policy meets their needs.</p> <p>The following points were raised:</p> <ul style="list-style-type: none"> <li>• Terminology of some conditions has changed e.g. regarding Autism</li> <li>• Comments about having some information in a guidance document rather than all being in the policy</li> <li>• Do we have EDI Champions in the council?</li> </ul>			

<b>Type of engagement/consultation</b>	Formal consultation with wider council	<b>Date</b>	01/11/2023 to 22/11/2023
<b>Who attended/participated?</b>	HRM, HR Ops, SMG, Trade Unions and Equality forum groups		
<b>Protected characteristics</b>	A range of protected characteristics including, gender,		

	of participants	race, age, disability.		
	<p><b>Feedback</b></p> <p>As part of the consultation process, the new policy and accompanying guidance was emailed to the wider council &amp; TUs to review and make comments on.</p> <ul style="list-style-type: none"> <li>• General positive comments about the policy “<i>I have read through the documents and think this is brilliant and a really supportive approach</i>” and “<i>I am massively in favour of policy’s like this to help employees and managers alike and think each case is going to have to be managed on its individual merits</i>” and “<i>As someone who is neurodivergent (OCD) I really welcome these policies</i>”</li> <li>• Can guidance include all/more neurodiversity conditions?</li> <li>• Is training available to access now?</li> <li>• Guidance document should include who the equality champions are or where to find the information.</li> </ul>			
6	<b>Concise overview of all evidence, engagement and consultation</b>			
	<p>The main points of feedback following the consultation are as follows:</p> <ul style="list-style-type: none"> <li>• Consultees are happy to see that the council now has a Neurodiversity policy.</li> <li>• Consultees want the guidance document to include information that covers more neurodiversity conditions and information about where to find neurodiversity training.</li> </ul> <p>The policy will be submitted to CMT in February 2024 followed by Personnel Committee for approval on 04/03/2024.</p>			
7	<b>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.</b>			
	<b>Characteristic</b>	<b>Affect</b>	<b>Reason</b>	<b>Action needed Yes / No</b>
	<b>Age</b>	Neutral	The policy applies to all employees / workers – no impact foreseen	<b>No</b>
	<b>Disability</b>	Negative	Potential impact on employees / workers who require reasonable adjustments for communication who do not understand the policy e.g.	<b>Yes</b>

		Positive	employees with learning disabilities. The policy provides support and recommends reasonable adjustments for those whom neurodiversity condition might be considered a disability.	<b>No</b>
	<b>Gender reassignment</b>	Neutral	The policy applies to all employees / workers – no impact foreseen	<b>No</b>
	<b>Marriage and civil partnership</b>	Neutral	The policy applies to all employees / workers – no impact foreseen	<b>No</b>
	<b>Pregnancy and maternity</b>	Neutral	The policy applies to all employees / workers – no impact foreseen	<b>No</b>
	<b>Race</b>	Negative	Potential impact on employees / workers where English is not their first language as they may not understand the policy.	<b>Yes</b>
	<b>Religion or belief</b>	Neutral	The policy applies to all employees / workers – no impact foreseen	<b>No</b>
	<b>Sex</b>	Positive	The policy applies to all employees / workers. It includes the effects of both menopause and andropause.	<b>No</b>
	<b>Sexual orientation</b>	Neutral	The policy applies to all employees / workers – no impact foreseen	<b>No</b>
<b>8</b>	<b>Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details.</b>			(Delete one) <b>No</b>
	N/A			
<b>9</b>	<b>Which justifiable action does the evidence, engagement and consultation feedback suggest you take?</b>			
	A	No major change required		
	B	<b>Adjustments needed to remove barriers or to better promote equality</b>		
	C	Continue despite possible adverse impact		
	D	Stop and rethink your proposal		

<b>Action and monitoring plan</b>				
<b>Action Date</b>	<b>Action</b>	<b>Responsibility</b>	<b>Outcome Date</b>	<b>Outcome</b>
Day of launch	The policy to be explained/made available to affected employees / workers.	Employee's / workers line manager should make themselves available to explain the policy to ensure understanding and offer support and guidance 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 / workers 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 launch	Alternative formats (audio and Easy Read) for disabled employees to be made available on request.	Liaison as required with the appropriate council procured services; audio formats from Walsall Society for the Blind and Easy Read from the Community, Equality and Cohesion team.	As and when required	

<b>Update to EqIA</b>	
<b>Date</b>	<b>Detail</b>
<p><a href="#">Use this section for updates following the commencement of your proposal.</a></p>	

**Contact us**

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