

Equality Impact Assessment Template – Policy, function or strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended.

1. Policy, function or strategy		
a.	Name/description of the policy, function or strategy ¹	Code of Conduct (Employees)
b.	Responsible organisation(s)/Lead Service	Organisational Development (OD), Policy and Communications Service
c.	Lead Officer	Morna Rae, Head of OD, Policy and Communications
d.	Date of Impact Assessment	03/05/2024
e.	Partners/other Services involved in the development of the policy, function or strategy	Cross-Service Workforce Development Group and the Trade Unions
f.	Is the policy, function or strategy?	<input type="checkbox"/> New
		<input checked="" type="checkbox"/> Reviewed/Revised
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy, function or strategy or the substantive change to the policy, function or strategy)?	<p>The purpose of this Code is to provide advice and guidance about the standards of behaviours expected of employees, their rights, and duties at work to avoid any breach of the Code of Conduct.</p> <p>The implementation of the Code of Conduct will help the Council meet its obligations in terms of The Equality Act 2010 and The Health and Safety at Work Act 1974.</p>
h.	What are the intended outcomes of the policy, function or strategy?	The public expects a high standard of conduct from all local government employees. The Council’s Code of Conduct is one

¹ Please attach details of the policy, function or strategy to this Template

		of the ways we put the Council’s values into practice. The Code describes the standard of behaviours expected of all Inverclyde Council employees in their day-to-day duties, and communications with colleagues, managers, Councillors, service users, other organisations, and members of the public. It also provides guidance where conduct outside of work may impact on the employment relations.	
i.	Geographical area (Inverclyde-wide or a specific location)	Inverclyde-wide	
j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
		X	Advance equality of opportunity between people of different groups
		<input type="checkbox"/>	Foster good relations between people from different groups
k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	Yes, via membership of working groups/forums including, for example, the Council’s Workforce Development Group, and the Trade Union Liaison Group.	

2. Does the policy, function or strategy impact on:		
	Yes	No
a. Protected Characteristics under The Equality Act 2010: Age; Care experienced; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation (see Section 3)	Yes	

b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty ² (see Section 6)		No
c. Inverclyde Alliance Partnership Plan 2023/33 ³ (see Section 7)	Yes	
d. Council Plan 2023/28 ⁴ (see Section 8)	Yes	

3. If ‘Yes’ is selected for any part of Section 2, please populate the other relevant Sections of this Template.

4. If ‘No’ is selected for every part of Section 2, please state the reasons for this.

Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy and Performance Officer:
karen.barclay@inverclyde.gov.uk

Signature:	Date:
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3. Impact – Protected Characteristics

Which of the Protected Characteristics will the policy, function or strategy have an impact upon?

	Impact	

² [Fairer Scotland Duty: guidance for public bodies](#)
³ [Inverclyde Alliance Partnership Plan 2023/33](#)
⁴ [Council Plan 2023/28](#)

Protected Characteristic	Positive		Neutral	Negative		Reasons/Comments
	High	Low		High	Low	
Age		X				<p>The Code of Conduct specifically articulates that all employees must respect fellow employees and the role they play, treating them with courtesy and dignity at all times. Similarly, they must respect members of the public when performing duties and observe the principles of the Code in dealings with the public when performing their duties as an employee.</p> <p>The Code of Conduct states that all appointments must be made on the basis of merit and follow the Recruitment and Selection Policy. The Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (i.e. signposts to grievance procedure) which may help to tackle prejudice.</p>
Care experienced			X			<p>We conclude there is no evidence to suggest that this Code may impact directly/indirectly on people who are care experienced and therefore make no further recommendations in this area.</p>
Disability		X				<p>The Code of Conduct states that all appointments must be made on the basis of merit and follow the Recruitment and Selection Policy. This promotes the Council's commitment to, and membership of, the Disability Confident Scheme and therefore the Code of Conduct reinforces the promotion of equal opportunities for Disabled applicants and employees.</p> <p>Employers must do all they reasonably can to protect people from unfair treatment and take steps to prevent disability discrimination at work (source: the Advisory, Conciliation and Arbitration Service). The Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (i.e. signposts to grievance procedure) which may help to tackle prejudice.</p>
Gender Reassignment		X				<p>The Code of Conduct specifically articulates that all employees must respect fellow employees and the role they play, treating them with courtesy and dignity at all times. Similarly, they must respect members of the public when performing duties and observe the principles of the</p>

					<p>Code in dealings with the public when performing their duties as an employee.</p> <p>The Code of Conduct states that all appointments must be made on the basis of merit and follow the Recruitment and Selection Policy. The Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (i.e. signposts to grievance procedure) which may help to tackle prejudice.</p>
Marriage and Civil Partnership			X		<p>We conclude there is no evidence to suggest that this Code may impact directly/indirectly on people who are Married or in a Civil Partnership and therefore make no further recommendations in this area.</p>
Pregnancy and Maternity			X		<p>We conclude there is no evidence to suggest that this Code may impact directly/indirectly on people who are pregnant or on maternity leave and therefore make no further recommendations in this area.</p>
Race		X			<p>The Code of Conduct specifically articulates that all employees must respect fellow employees and the role they play, treating them with courtesy and dignity at all times. Similarly, they must respect members of the public when performing their duties and observe the principles of the Code in dealings with the public when performing their duties as an employee.</p> <p>The Code of Conduct policy states that all appointments must be made on the basis of merit and follow the Recruitment and Selection Policy. The Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (i.e. signposts to grievance procedure) which may help to tackle prejudice.</p>
Religion and Belief		X			<p>The Code of Conduct specifically articulates that all employees must respect fellow employees and the role they play, treating them with courtesy and dignity at all times. Similarly, they must respect members of the public when performing their duties and observe the principles of the Code in dealings with the public when performing their duties as an employee.</p>

						<p>The Code of Conduct states that all appointments must be made on the basis of merit and follow the Recruitment and Selection Policy. The Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (i.e. signposts to grievance procedure) which may help to tackle prejudice.</p>
Sex		X				<p>The Code of Conduct specifically stipulates that sexual harassment, bullying and victimisation is not acceptable.</p> <p>The Code of Conduct specifically articulates that all employees must respect fellow employees and the role they play, treating them with courtesy and dignity at all times. Similarly, they must respect members of the public when performing their duties and observe the principles of the Code in dealings with the public when performing their duties as an employee.</p> <p>The Code of Conduct states that all appointments must be made on the basis of merit and follow the Recruitment and Selection Policy. The Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (i.e. signposts to grievance procedure) which may help to tackle prejudice.</p>
Sexual Orientation		X				<p>The Code of Conduct specifically articulates that all employees must respect fellow employees and the role they play, treating them with courtesy and dignity at all times. Similarly, they must respect members of the public when performing their duties and observe the principles of the Code in dealings with the public when performing their duties as an employee.</p> <p>The Code of Conduct states that all appointments must be made on the basis of merit and follow the Recruitment and Selection Policy. The Code of Conduct promotes fair and reasonable treatment at work and details what to do if an individual feels they have been unfairly treated or discriminated against (i.e. signposts to grievance procedure) which may help to tackle prejudice.</p>

Classification: Official

<p>Other groups to consider</p> <ul style="list-style-type: none"> • Carers • The Armed Forces Covenant Duty • Elected Members, external agencies, partners and contractors who work in partnership with the Council 		X				<p>Elected Members, external agencies, partners and contractors who work in partnership with the Council have a responsibility to comply with the Code of Conduct.</p>
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<p>4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?</p>	
X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
X	Advance equality of opportunity between people from different groups
<input type="checkbox"/>	Foster good relations between people from different groups

<p>5. Impact – Groups</p>
<p>From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.</p>

Positive impact + <i>(Describe groups affected.)</i>	Negative impact - <i>(Describe groups affected.)</i>
<u>Age/Disability/Gender Reassignment/Race/Religion and Belief/Sex/Sexual Orientation</u> : The Council will ensure that good equal opportunities practice underpins the operation of the Code of Conduct and will apply to all employees irrespective of Age, Disability, Gender Reassignment, Race, Religion and Belief, Sex and Sexual Orientation.	

6. Impact – Fairer Scotland Duty

What impact will the policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

Positive impact +	Neutral impact =	Negative impact -
	=	

7. Impact – Inverclyde Alliance Partnership Plan 2023/33

Which Themes from the Inverclyde Alliance Partnership Plan 2023/33 will the policy, function or strategy impact on?

X	Theme 1: Empowered people <ul style="list-style-type: none"> • Communities can have their voices heard, and influence the places and services that affect them • Gaps in outcomes linked to poverty are reduced
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X	<p>Theme 2: Working people</p> <ul style="list-style-type: none"> • More people will be in sustained employment, with fair pay and conditions • Poverty related gaps are addressed, so young people can have the skills for learning, life and work • Businesses are supported and encouraged to reduce their carbon footprint and develop green jobs
□	<p>Theme 3: Healthy people and places</p> <ul style="list-style-type: none"> • People live longer and healthier lives • Supportive systems are in place to prevent alcohol and drug misuse • Our natural capital is looked after, and we are effectively adapting and mitigating the effects of climate change
□	<p>Theme 4: A supportive place</p> <ul style="list-style-type: none"> • Vulnerable adults and children are protected and supported, ensuring they can live safely and independently • We recognise where people are affected by trauma, and respond in ways that prevent further harm and support recovery • Public protection and community safety are improved through targeting our resources to reduce the risk of offending and harm
□	<p>Theme 5: A thriving place</p> <ul style="list-style-type: none"> • Growth in our working age population by encouraging people to stay here, and attracting new people to settle here • Development of strong community-based services that respond to local need • Homes are energy efficient and fuel poverty is reduced • Increased use of active travel and sustainable transport options • Easy access to attractive and safe public spaces, and high-quality arts and cultural opportunities

Theme 1: A clear Code of Conduct that is followed by employees promotes a culture of high standards and trust. This, in turn, may encourage the Council’s stakeholders to participate in community engagement activity.

Theme 2: Adherence to merit-based appointment and recruitment and fair working practices supports employment.

8. Impact – Council Plan 2023/28

Which Themes from the Council Plan 2023/28 will the policy, function or strategy impact on?

X	Theme 1: People <ul style="list-style-type: none">• Our young people have the best start in life through high quality support and education• Gaps in outcomes linked to poverty are reduced• People are supported to improve their health and wellbeing• More people will be in employment, with fair pay and conditions• Our most vulnerable families and residents are safeguarded and supported
X	Theme 2: Place <ul style="list-style-type: none">• Communities are thriving, growing and sustainable• Our strategic housing function is robust• Our economy and skills base are developed• We have a sufficient supply of business premises• Our natural environment is protected
X	Theme 3: Performance <ul style="list-style-type: none">• High quality and innovative services are provided, giving value for money• Our employees are supported and developed
<p>Themes 1, 2 and 3: A clear Code of Conduct that is followed by employees promotes a culture of high standards and trust. This, in turn, may encourage the Council's stakeholders to participate in community engagement activity. Compliance with the Code also leads to high quality service delivery.</p> <p>Adherence to merit-based appointment and recruitment and fair working practices supports employment and employee development.</p>	

9. Evidence

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens' Panel, focus groups, interviews, projects, user feedback, complaints, Officers' knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

Evidence	Details
Consultation/engagement (including any carried out while developing the policy, function, or strategy)	Consultation took place with the Staff Disability Forum, the Workforce Development Group, the Trade Union Liaison Group, all of whom have expressed their support of the Code.
Research	<p>The Code of Conduct has been developed by the Council taking account of relevant legislative requirements, the 'Seven Principles of Public Life' identified by the Nolan Committee on Standards in Public Life and endorsed by the Convention of Scottish Local Authorities in its Code of Conduct for Local Government Employees in Scotland.</p> <p>Benchmarking with other local authorities' and other organisations' Codes of Conduct. We sense checked our Code with other similar documents in terms of consistency of approach and identifying any areas that we had not previously considered. Our document sits well within this context.</p>
Officers' knowledge and experience (including feedback from frontline staff)	The Code of Conduct has been reviewed/revised by HR Advisors who have the relevant expertise and knowledge.
Equalities monitoring data	The Council monitors the breakdown of staff by Protected Characteristics via its Equality Mainstreaming Reports.
User feedback (including complaints)	
Stakeholders Other	

Are there information gaps and, if so, what are these?	
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10. Consequences of Analysis

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	X	The Code of Conduct will be reviewed on a five yearly basis and as required following any legislative changes.
b.	Continue development with minor alterations	<input type="checkbox"/>	
c.	Continue development with major changes	<input type="checkbox"/>	
d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	

How will the effect of the policy, function or strategy be monitored following implementation?

Issues arising from employee relations are regularly discussed by the Trade Union Liaison Group and monitored through the Workforce Information and Activity Report.

<p>When is the policy, function, or strategy due to be implemented?</p> <p>Immediately following Committee approval.</p>
<p>When will the policy, function or strategy be reviewed?</p> <p>Every five years unless legislative requirements bring this forward.</p>
<p>What resources are available for the implementation of the policy, function or strategy? Have these resources changed?</p> <p>The Code of Conduct will be managed by HR Advisors alongside relevant policies.</p>

<p>11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.</p>
<p>Where appropriate, the Code of Conduct should be read in conjunction with other relevant documentation such as the Council's Conditions of Service Handbook, the Council's Policy and Procedures on Discrimination, Victimisation, Harassment and Bullying and the Whistleblowing (Confidential Reporting) Policy.</p>

Details of the Person(s) who completed the Assessment:	
Name:	Morna Rae
Position:	Head of Service

Classification: Official

Date:	11/06/24
Authorised by:	
Name:	Ruth Binks
Position:	Corporate Director – Education, Communities and OD
Date:	16/06/24

Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at karen.barclay@inverclyde.gov.uk.