



## **Corporate Health and Safety Policy Equality Impact Assessment**

**Publication code: HS-0213-010**

<b>Publication date</b>	November 2011
<b>Version number</b>	1
<b>Author's initials</b>	GB
<b>Job title</b>	Health and Safety Advisor
This is the first version of this document.	

## Equality Impact Assessment

<b>Stage 1</b>	<b>IDENTIFY POLICY AIMS</b> <ul style="list-style-type: none"> <li>• <b>Explore Existing Evidence</b></li> </ul>
<b>TITLE OF POLICY, PRACTICE OR PROCEDURE</b>	Corporate Health and Safety Policy
<b>START DATE</b>	18 April 2011
<b>EQUALITY IMPACT ASSESSMENT - CORE TEAM</b>	Lead Director – Gordon Weir, Director of Resources  Lead Officer – Gillian Batchelor, HR Adviser (Health & Safety) Heather Stevenson Human Resources Manager
<b>Purpose and objectives of the policy, practice or procedure</b>	This Health & Safety policy represents a commitment by SCSWIS to ensure its standard of health, safety and welfare is provided at all levels of the organisation and ensure that Health and Safety is an integral part of the overall management culture. The policy reflects the legal obligations placed upon the SCSWIS by the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999.
<b>Are there any further policies, practices &amp; procedures which be impacted as a result of this EIA?</b>	The Corporate Health and Safety Policy is the overarching statement of intent of SCSWIS in the health safety and welfare of staff and visitors. The policy details that there are additional policies and guidance in place to support staff and visitors' health, safety and wellbeing.  All of these additional policies and procedures contribute to the overarching Corporate Health and Safety Policy. They are therefore covered by the consultation process undertaken for health and safety in this equality impact assessment.

<p><b>Who will the policy, practice or procedure impact upon?</b></p>	<p>INTERNAL: All employees and managers within SCSWIS.</p>																								
	<p>EXTERNAL: This is an internal overarching health and safety policy, however our arrangements for safe access and egress and emergency arrangements could impact on members of the public, care providers, care users and other stakeholders if they visit our premises.</p>																								
<p><b>What do we know now about these stakeholders and this policy, practice or procedure in relation to age, race, disability &amp; gender?</b></p>	<p>As at 31 March 2010, we held the following equality information for employees:</p> <p><b>GENDER SPLIT</b></p> <table data-bbox="625 688 1312 797"> <tr> <td>Female Employees</td> <td>83%</td> </tr> <tr> <td>Male Employees</td> <td>17%</td> </tr> <tr> <td>Unknown</td> <td>0%</td> </tr> </table> <p><b>RACE</b></p> <p><b>White</b></p> <table data-bbox="625 906 1333 1052"> <tr> <td>Scottish</td> <td>75.2%</td> </tr> <tr> <td>Irish</td> <td>1.87%</td> </tr> <tr> <td>Any other white background</td> <td>2.4%</td> </tr> <tr> <td>Other British</td> <td>11.2%</td> </tr> </table> <p><b>Mixed</b></p> <table data-bbox="625 1166 1312 1203"> <tr> <td>Any Mixed Background</td> <td>0.5%</td> </tr> </table> <p><b>Asian, Asian Scottish or Asian British</b></p> <table data-bbox="625 1273 1333 1344"> <tr> <td>Indian</td> <td>0.34%</td> </tr> <tr> <td>Any other Asian Background</td> <td></td> </tr> </table> <p><b>Black, Black Scottish or Black British</b></p> <table data-bbox="625 1458 1333 1523"> <tr> <td>Caribbean</td> <td>0.17%</td> </tr> <tr> <td>African</td> <td>0.34%</td> </tr> </table>	Female Employees	83%	Male Employees	17%	Unknown	0%	Scottish	75.2%	Irish	1.87%	Any other white background	2.4%	Other British	11.2%	Any Mixed Background	0.5%	Indian	0.34%	Any other Asian Background		Caribbean	0.17%	African	0.34%
Female Employees	83%																								
Male Employees	17%																								
Unknown	0%																								
Scottish	75.2%																								
Irish	1.87%																								
Any other white background	2.4%																								
Other British	11.2%																								
Any Mixed Background	0.5%																								
Indian	0.34%																								
Any other Asian Background																									
Caribbean	0.17%																								
African	0.34%																								

	<p><b>Unknown</b> 7.98%</p> <p><b>EMPLOYEES WITH A DISABILITY</b> 3%</p> <p><b><i>EXTERNAL STAKEHOLDERS:</i></b></p> <p>Social Care and Social Work Improvement Scotland (SCSWIS) has been established to regulate and inspect care and support services and carry out social work and child protection inspections. It has a significant role in providing assurance and protection for people who use care and support services, their families and carers and the wider public.</p> <p>SCSWIS' external stakeholders include:</p> <ul style="list-style-type: none"> <li>• people who use care, social work and child protection services and their carers</li> <li>• providers and deliverers of care, social work and child protection services</li> <li>• people who work for care, social work and child protection services</li> <li>• organisations and scrutiny bodies that SCSWIS works in partnership with</li> <li>• Scottish Government and Ministers</li> <li>• any other people and organisations with an interest in care, social work and child protection services.</li> </ul>
<p><b>Discuss and agree what further data is needed to assess the likely impact of this policy in relation to age, race, disability and gender.</b></p>	<p>This Policy is legally robust and deals with all groups equitably as an overarching policy; however there is a need to ensure that the procedure is correctly implemented and that it achieves a positive impact within all equality groups.</p> <p>Based on all available data there is no evidence at this time to suggest that there is any adverse impact in relation to any protected characteristics. However, a full EIA with consultation with equality groups in relation to age, gender, race, disability, religion and belief, marriage and civil partnership and pregnancy and maternity will be carried out to ensure that this is the case.</p> <p>To do this we will carry out a full consultation exercise on the Corporate Health and Safety Policy and identify any possible negative impact on different equality groups by doing the following:</p> <ol style="list-style-type: none"> <li>1. Survey Monkey Questionnaire to all staff (including SCSWIS Lay Assessors)</li> <li>2. Anonymous Website consultation exercise open to all</li> <li>3. E mailing to relevant stakeholders groups (equality groups, people who use care</li> </ol>

	services and their carers)
<b>COMPLETION OF STAGE 1</b>	
If the policy, practice of procedure affects or impacts upon people, a full Equality Impact Assessment is required.	
If there is no direct impact on people, complete sign off form (Appendix A) which must be authorised by a Senior Manager and kept on file.	

Stage 2	COLLECT DATA & CONSULT
	<ul style="list-style-type: none"> <li>• <b>Obtain further evidence</b></li> </ul>
<b>Set out what data was collected and what it means for the policy, practice or procedure.</b>	<p>A survey monkey (questionnaire) was developed and asked the following questions:</p> <ul style="list-style-type: none"> <li>▪ Does the policy help you understand what arrangements are in place and what responsibilities different people have for health and safety?</li> <li>▪ Is there anything you would add to the policy?</li> <li>▪ Do you think this policy will have any impact, negative or otherwise on the protected characteristics?</li> <li>▪ Do you have any further comments on the Corporate Health and Safety Policy?</li> </ul>
<b>What consultation has taken place, with whom and over what period?</b>	<p>A survey monkey was created which was made available on SCSWIS' website for anyone to submit their comments for 3 weeks. In addition an all staff e mail was sent to all SCSWIS employees. An e mail with the survey monkey attached and sent to stakeholder groups – equality groups and people who use care services and their carers).</p> <p>There were 48 responses to the questionnaire/survey monkey.</p> <p>78.4% were SCSWIS employees  5.4% were a relative or carer of a person who uses a care service  5.4% were a service provider  8.1% other</p> <p>Of the responses:  26.7% had connections with a care home (used by a relative)  40% used a childminder or child service  46.7% had connections with a housing support or Care at Home service</p>

6.7% had connections with an Independent Healthcare service  
13.3% had connections with an other type of service

Male = 16.7%  
Female = 80.6%  
Prefer not to say = 2.8%

Heterosexual/straight = 74.3%  
Bisexual = 2.9%  
Gay woman/lesbian = 2.9%  
Prefer not to say = 20%

Age 35 - 44 = 16.7%  
45-54 = 50%  
55-64 = 16.7%  
65+ = 8.3%  
Prefer not to say = 8.3%

White Scottish, White British, White English  
White Welsh, White other = 94.1 %  
Prefer not to say = 5.9%

Disability Yes = 8.3%  
No = 83.3%  
Prefer not to say = 8.3%

- Does the policy help you understand what arrangements are in place and what responsibilities different people have for health and safety?  
Yes = 98%  
No = 0%  
Don't Know = 2 %
- Is there anything to add to the policy?  
Yes = 45%  
No = 55%
- Do you think this policy will have any impact, negative or otherwise on the protected characteristics?

	<p>Yes = 4.76% No = 95.24%</p> <ul style="list-style-type: none"> <li>▪ Do you have any further comments on the Corporate Health and Safety Policy? Yes = 30% No = 70%</li> </ul>
<p><b>Set out specifically how people with a disability were involved in the consultation process.</b></p>	<p>The survey (questionnaire) was open to all members of the public and staff members. Of the returned questionnaires 8.3% declared a disability plus the questionnaire went to disability groups who have been involved with the SCSWIS involving people group and previous consultation events.</p>
<p><b>Set out what feedback there was on the potential impact of the proposed policy, practice or procedure.</b></p>	<p>In general, the feedback on the draft procedure was positive and people welcomed the opportunity to consult and make a contribution to the final procedure.</p> <p>The feedback noted in the next section was received on the potential impact of the policy.</p>
<p><b>What did those consulted with support about the policy, practice or procedure?</b></p> <p><b>What concerns or issues did those consulted with have about the policy, practice or procedure?</b></p>	<p>In general, the feedback on the draft procedure was positive and people welcomed the opportunity to consult and make a contribution to the final policy.</p> <p>Comments included:</p> <ul style="list-style-type: none"> <li>▪ “It appears clear and details responsibilities under relevant legislation”</li> <li>▪ “Think it is comprehensive”</li> <li>▪ “It appears fair and equal to all”</li> <li>▪ “It protects all – generic”</li> </ul> <p>The following feedback was received on the potential impact of the policy:</p> <ul style="list-style-type: none"> <li>▪ Does the policy help you understand what arrangements are in place and what responsibilities different people have for health and safety?</li> </ul> <p>Comments included : “Yes, but further clarification from a trade union point of view” “Yes but only on a general level”</p> <ul style="list-style-type: none"> <li>▪ Is there anything to add to the policy?</li> </ul> <p>Comments included:</p>

	<p>“Home working and employees responsibilities”</p> <p>“Do we need to specify SCSWIS expectations regarding aggressive providers towards our staff”</p> <p>Use gender free language see Health and Safety at Work Statement: amend “his” and “her” to their,</p> <p>“No if there is suitable detail in the individual policies”</p> <p>“There is no direct mention of Lay Assessors or other volunteers are these included under the general heading of visitors?”</p> <p>“There is an issue that we cannot record a risk unless in the IRT as part of inspection so the policy needs to explain this too”</p> <p>“A flow chart of responsibilities hierarchy”</p> <p>“Risk assessments specific mention of driving to inspections in winter (seasonal)”</p> <p>“Staff taking responsibility not to create hazardous situations for themselves and others”</p>
<b>What changes did those consulted with suggest?</b>	<p>Comments included in addition to the above points:</p> <p>“More reference to partnership forum responsibilities”</p> <p>“Home working and employees responsibilities”</p> <p>“Staff should be consulted for all draft policies”</p> <p>“Main references to partnership working with the Trade Unions had been removed, except in section 2.9”</p>
<b>If the changes resulted in further consultation, what has taken place, with whom and over what period?</b>	<p>The final Corporate Health and Safety Policy will be published on the SCSWIS’ website and sent to the people who were involved in the consultation where possible. Suggestions on how to improve the Corporate Health and Safety Policy will be welcome at any time.</p>

<b>Stage 3</b>	<b>DELIVER RESULTS</b>
	<ul style="list-style-type: none"> <li>• <b>Assess the impact &amp; take action</b></li> </ul>
<b>Set out what changes or improvements have been made to the policy, practice or procedure as a result of the consultation and why.</b>	<p>There was nothing suggested from the consultations exercise that has not been given due consideration and thought.</p> <p>The comments regarding local partnership forum from trade union representatives have been acknowledged and more detail written into the policy. Further detail will need to be added once the format of area partnership forums is decided.</p> <p>Although comments have been taken on board and the procedure has changed to reflect</p>



	<p>some of the proposed changes, a judgement has been made as to how to best take these areas forward. It was also important to continue to reflect the SCSWIS' principles and aims for the procedure.</p> <p>Use gender free language – health and safety legislation specifically refers to “his” and “her” which is why that specific language had been used – a direct lift from the legislation. This has now been changed.</p>
<p><b>Set out what suggested changes or improvements have not been made and why.</b></p>	<p>The Corporate Health and Safety Policy is an overarching statement of intent and it does note that other policies and procedures will add to that corporate statement by being more specific for their purpose. Some comments relate to specific policies rather than the overarching Corporate Health and Safety Policy and this has been highlighted where applicable below.</p> <ul style="list-style-type: none"> <li>○ Home working and employees responsibilities – This is noted in the Home working policy and employee responsibilities are recorded there too.</li> <li>○ SCSWIS expectations regarding aggressive providers – the lone working guidance cover this as does the incident reporting procedure. It should also be discussed in teams annually as part of the risk assessment policy arrangements</li> <li>○ “There is an issue that we cannot record a risk unless in the IRT as part of inspection so the policy needs to explain this too” - this does not refer to a change in the policy but this will need to be investigated with ICT. Otherwise if there are instances of incident towards a member of staff the incident reporting procedure should be followed. This will need to be discussed further with local operational staff and incorporated into future procedures like the lone working guidance.</li> <li>○ Hierarchy of responsibility – already does this as responsibilities are noted from the Board to employees and health and safety support.</li> <li>○ Driving in winter (seasonal) – this is covered by driving guidance and it should be discussed during the team risk assessment annually.</li> <li>○ “There is no direct mention of Lay Assessors or other volunteers are these included under the general heading of visitors?” – Lay Assessors volunteer to do work with SCSWIS and therefore have the same protection under health and safety legislation as everyone else. Health and Safety legislation covers everyone.</li> <li>○ Employee responsibility – this is in the policy already and is noted in every policy and guidance. Premises inspections and risk assessments should also take into account housekeeping and individual responsibility as well as day to day management.</li> <li>○ Health and Safety training – noted in the policy and there are health and safety training opportunities ongoing. These should be communicated through managers and the</li> </ul>

	<p>intranet. Health and safety should be completed through the local induction process.</p> <ul style="list-style-type: none"> <li>○ Staff to review all draft policies – this is not practical, however the partnership forum is consulted with for every policy and procedure. Health and safety policies are created to support the health and wellbeing of all staff and visitors and should not be contentious issues.</li> </ul>
<b>Notify those consulted with of the changes and seek and record their further comment.</b>	The Corporate Health and Safety Policy will be published on the SCSWIS website.

<b>Stage 4</b>	<b>APPROVE and PUBLISH</b>
<b>Draft the appropriate approval paper.</b>	Approval paper has been written April 2011. The Corporate Health and Safety Policy was sent and approved by the Executive Team on the 12 May 2011 and will then proceed to the Resources Committee on the 31 May and then Board for final approval on the 16 June 2011.
<b>Summarise the equality impact assessment undertaken in the equality and consultation sections of the approval paper.</b>	Not applicable
<b>On the cover of the paper in the recommendations, seek approval for publication of the Equality Impact Assessment and attach the full assessment as an appendix.</b>	EIA completed and attached.
<b>Record how the policy, practice or procedure will be approved and published i.e. dates at RMT, EMT, Board or Committee etc.</b>	The revised Corporate Health and Safety Policy was sent and approved by the Executive Team on the 12 May 2011 and will then proceed to the Board for final approval on the 16 June 2011.
<b>Publish the Equality Impact Assessment on the website and</b>	June 2011

<b>implement the new policy, practice or procedure.</b>	
<b>Retain a copy on the project file and pass a copy to the Professional Adviser Equality and Engagement.</b>	June 2011

<b>Stage 5</b>	<b>MONITOR &amp; EVALUATE</b>
	<ul style="list-style-type: none"> <li>• <b>Make monitoring arrangements</b></li> </ul>
<b>Set out how and when the policy, practice or procedure will be monitored and evaluated.</b>	Health and safety policies and procedures are reviewed every three years or when legislation or internal processes change. This procedure's formal review will take place in 2014.

Social Care and Social Work Improvement Scotland  
 Compass House  
 11 Riverside Drive  
 Dundee  
 DD1 4NY  
**Helpline 0845 603 0890**  
**www.scswis.com**