

HDC Due Regard (Equality Analysis)

Due Regard (Equality Analysis) is an on-going proactive process which requires us to consider the effect our decisions are likely to have on local communities, service users and employees, particularly those most vulnerable and at risk of disadvantage.

This template has been designed to assist in the collation of information and evidence required to support the 'Due Regard' process when introducing new policies/procedures/functions and services or reviewing existing ones.

Name of policy/procedure/function/service being analysed: Shared Parental Leave Policy

Department and section: Human Resources

Name of lead officer: Ailie Rowlands / Elaine Griffin

Other people involved (assisting or reviewing – including any service users or stakeholder groups etc.): Rebecca Jenner

Date assessment completed: November 2021

Step 1: Defining the policy/procedure/function/service

Is this a new, amended, or reviewed policy? What are the aims, objectives and purpose and how will they be achieved? What are the main activities and which communities are likely to be affected by these activities? What are the expected outcomes?

The purpose of the Shared Parental Leave Policy is to provide a fair and consistent framework for all employees. The policy is there to assist and guide employees through what is thought of as a complex process. This policy offers guidance to employees and explains the options available to them in addition to Maternity and Adoption Leave and Paternity Leave which will hopefully encourage take-up for those who would like to take up this option.

The policy is relevant to all employees of the Council, particularly those who are becoming a parent and going to be taking leave due to pregnancy, adoption, or surrogacy, and who plan to share the parental leave

Step 2: Data collection & evidence

What relevant evidence, research, data, and other information do you have and is there any further research, data, or evidence you need to fill any gaps in your understanding of the potential or known effects of the policy on different communities? Include quantitative data as well as qualitative intelligence such as community input and advice.

Up until now equality monitoring in respect of the impacts of employment policies has been based on staff being sent a link to a survey monkey questionnaire when they have invoked a policy, or they were subject to the formal stages of a policy. Completion of the survey is voluntary and therefore the completion rate has been inconsistent. Unfortunately, this has resulted in little useable data, due to the limited number of responses received, and therefore the accuracy of analysis being flawed. To try and address this, the Human Resources team will now start monitoring policy use against the equality data held on the recently introduced iTrent system. The Human Resources team

will continue to encourage the use of the system for recording of equality data and seek for improvements in the recording and monitoring of equality data, particularly, using the iTrent system.

The policy applies to all permanent Council employees and temporary employees who have been employed on successive temporary contracts for more than 12 months, we currently have a total of 209 employees. To date, no employees have used our Shared Parental Leave Policy.

The breakdown of our current workforce can be found in our latest [workforce comparison report](#).

Step 3: Consultation and involvement

Have you consulted and if so, outline what you did and who you consulted with and why?

Unison, Human Resources Team, Equality and Diversity Officer

Step 4: Potential impact

Considering the evidence from the data collection and feedback from consultation, which communities will be affected and what barriers may these individuals or groups face in relation to Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation, Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, current and ex-armed forces personnel (Veterans), deprived or disadvantaged communities and also the potential impact on Community Cohesion. Remember people have multiple characteristics so the impact of a policy on a particular community may impact people within the community differently. Where possible include numbers likely to be affected.

We have no current organisational data to help us to identify potential impacts, however we have aimed to address this by making sure that our policy considers all characteristics. We believe that there are distinct benefits to maintaining a diverse workforce and it is important that all characteristics are represented within our organisation. The aim of the policy is to ensure that all employees are clear with regards to their entitlements under this policy and that if an employee has a particular need due to a relevant protected characteristic, then adjustments will be made accordingly to ensure that they are not disadvantaged and do not miss out.

Age and gender – Data shows that statistically in the UK males have higher income levels than females and are more likely to work full time than part time. Data also shows that generally wage levels also increase with age and experience. In 2019 the average age for mothers was 30.7 years and fathers were 33.6 years. There are no statistics for those who use surrogacy or adoption, but many people choose these options after trying for a baby and therefore are more likely to be older than this at the time that they may look to utilise this policy. Therefore, considering the information above there may be increased financial considerations which will prevent older males from being able to make use of this policy as the difference between their normal weekly earnings and the level of the statutory payment made for shared parental leave may be too great. The difference for a younger, part time worker would be less and therefore the ability to make

use of this policy more realistic. This difference means that many couples may opt for utilising enhanced maternity leave payments rather than sharing the leave for financial rather than personal reasons. Or the person earning the least, who is often female as their average income is lower, will be the partner who utilises the shared parental leave. This means that females will be more likely to use this policy and undertake the childcare role and males more likely to continue to work.

We are not the only organisation who are seeing a very low take up of this policy. In 2019, statistics showed that only 2% of eligible couples in the UK made use of Shared Parental Leave (13,100 couples).

Disability - Due to the complex nature of the policy we appreciate that it can be difficult to understand, and this may be more difficult for any employees with a learning disability, dyslexia etc. For this reason, as part of the policy, all individuals are invited to make an appointment with the Human Resources Department to discuss their options and intentions. The Human Resources Department also continue to work with the ICT and Communications Departments and the Equality and Diversity Officer in order to improve the online accessibility and readability of the policy and procedure. The policy is published on the intranet in an accessible format. This will also positively impact those employees who use English as a second language.

There are several policies which support this Shared Parental Leave Policy, and these include our Maternity and Adoption and Paternity Leave Policies. All of these policies are written on a gender-neutral basis which ensures that people are not disadvantaged due to their gender, gender reassignment or sexual orientation. This includes maternity leave which can also now be shared with a partner, regardless of sexual orientation.

There appear to be no direct impacts of race and religion or belief with regards to the policy, but this will need to be looked into further following analysis of the new monitoring usage measures and any feedback received by employees.

No employee data is kept regarding the socio-economic status of employees but as Harborough District Council's commitment to equality will be observed during the implementation of the policy all employees should be treated fairly and reasonable additional support offered if required. The Shared Parental policy is designed to be fair to the employee.

Step 5: Mitigating and assessing the impact

If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons. If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. Consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs have identified can be addressed.

<p>We do not feel that there is any actual or potential adverse impacts of this policy, but we will use any information from feedback or monitoring to address any concerns which may arise. We also have a robust appeals and grievance structure which should help to highlight any potential disadvantage and bring it to our attention if necessary.</p>
<p>Step 6: Making a decision Summarise your findings and give an overview of whether the policy will meet Harborough District Council’s responsibilities in relation to equality, diversity, and human rights. Does it contribute to the achievement of the three aims of the Public Sector Equality Duty – eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity and foster good relations?</p>
<p>We have tried to ensure that the policy is easy to follow, fair and consistent with the aim that if followed correctly no employee will be treated more or less favourably than another unless there is justification for doing so. Therefore, we feel that this policy will help us to show due regard.</p>
<p>Step 7: Monitoring, evaluation & review of your policy/procedure/service change What monitoring systems will you put in place to promote equality of opportunity, monitor impact and effectiveness, and make positive improvements? How frequently will monitoring take place and who will be responsible?</p>
<p>The Human Resources team will monitor policy use against the equality data held on the recently introduced iTrent system. They will continue to encourage the use of the system for recording of equality data and continue to look for improvements in the recording and monitoring of equality data, particularly through the use of the iTrent system.</p>

Equality Improvement Plan

Equality Objective :

<p>Action: The Human Resources team will monitor policy use against the equality data held on the recently introduced iTrent system. Human Resources will continue to encourage the use of the system for recording of equality data and continue to look for improvements in the recording and monitoring of equality data, particularly through the use of the iTrent system.</p>
<p>Officer Responsible: Elaine Griffin By when: November 2023</p>

Equality Objective :

<p>Action:</p>
<p>Officer Responsible: By when:</p>

Signed off by: Rebecca Jenner – HR Manager

A handwritten signature in black ink, appearing to read 'Benno', written in a cursive style.

Date: 10th January 2022

Once signed off, please forward a copy for publication to Julie Clarke, Equality and Diversity Officer
e-mail: j.clarke@harborough.gov.uk , telephone: 01858 821070.