

Appendix 1: Equality Impact Assessment Screening:

Performance Development and Management Framework

1. Context

This EIA screening is undertaken because the paper requires a decision in relation to a **policy review**

The main risks identified with the draft policy are:

- The limited approach to linking the policy to the CCG's strategic aims of promoting equality and diversity for patients and employees.
- The subjectivity which can influence the assessment of employee performance and potential for further development and promotion.
- The lack of guidance on how to adjust for the impact of illness, disability or pregnancy on objective-setting and performance assessment.
- The difficulties of quality assuring practice and outcomes, especially of verifying equitable application across the protected characteristics.

2. Relevance to the Public Sector Equality Duty:

1) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010

This policy can impact in positive or negative ways on employees' career prospects, long-term remuneration and retention, depending on how fairly and effectively it is implemented. It can also impact on the CCG's strategic aims of tackling health inequalities and eliminating discrimination in the design and delivery of services. To maximise the potential for positive impacts, the draft policy has been revised in order to:

- link the policy with the CCG's strategic aims of tackling health inequalities, eliminating discrimination and promoting equal opportunities for patients and employees (e.g. designing and delivering services appropriate for a diverse population and ensuring equitable recruitment, retention and employee satisfaction)
- include guidance on adjusting for the impact of illness, disability or pregnancy on objective-setting and performance assessment
- raise the awareness of managers around the dangers of allowing subjective factors to influence their assessments of employee performance and potential for further development and promotion
- make equality and diversity more explicit within each of the competency indicator sets
- include a provision to monitor individual performance ratings, appeals and grievances in a way which can identify any differential outcomes related to key protected characteristics (lack of such monitoring and quality assurance arose as an issue when the former NHS Bristol implemented the NHS Equality Delivery System)

2) Advance equality of opportunity between people who share a protected characteristic and those who do not

- By making it a requirement for line managers to consider the potential of all employees for further development, this policy has the potential to promote equitable personal and career development opportunities
- By providing for performance and competency assessment to be a regular and ongoing process, this minimises the potential for employees with communication difficulties (arising, for example, from dyslexia) to be disadvantaged by a process which relies on a one-off presentation of evidence of performance
- The draft policy has been amended to include a requirement to monitor its implementation, offering the possibility to identify and address any barriers to good performance and progress faced by key protected groups
- There is an outstanding need for the CCG to be clear about:
 - i. whose responsibility it is to respond to evidence, within workforce reporting statistics, of the underrepresentation of key protected groups within particular occupations or at senior levels
 - ii. what role succession planning should play in identifying and encouraging talented individuals from protected groups in order to address underrepresentation at senior levels.
(However this will be addressed in the Succession Planning Policy for Bristol CCG).

3) Foster good relations between people who share a protected characteristic and those who do not

- This policy has the potential to foster good relations by setting out clear and transparent procedures and guidance around performance development and management
- In case of disagreement on performance ratings, processes of appeals and grievance are provided for

3. Impact on Protected Groups:

Has the above identified that the paper has any relevance to any of the following protected characteristics?

Age.	Yes	Disability.	Yes	Sexual Orientation.	Yes
Race.	Yes	Sex.	Yes	Religion or Belief.	Yes
Gender Reassignment.	Yes	Pregnancy & Maternity.	Yes	Marriage or Civil Partnership Status	No

4. Health Inequalities:

Does it relate to an area with known Health Inequalities? No

5. Where it is considered that the paper has no relevance to the General Duty or Protected Groups, this should be recorded here with reasons along with any advice received:

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6. Conclusion:

Proceed to full EIA: No
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Date: 5 March 2014