

## Equality Impact Analysis

This equality impact analysis establishes the likely effects both positive and negative and potential unintended consequences that decisions, policies, projects and practices can have on people at risk of discrimination, harassment and victimisation. The analysis considers documentary evidence, data and information from stakeholder engagement/consultation to manage risk and to understand the actual or potential effect of activity, including both positive and adverse impacts, on those affected by the activity being considered.

To support completion of this analysis tool, please refer to the equality impact analysis guidance.

### Section 1 – Analysis Details (Page 5 of the guidance document)

<b>Name of Policy/Project/Decision</b>	Capability Policy for Managing Underperformance
<b>Lead Officer (SRO or Assistant Director/Director)</b>	Tim Normanton
<b>Department/Team</b>	Corporate Core
<b>Proposed Implementation Date</b>	November 2025
<b>Author of the EqlA</b>	Nicole Howarth – HR & OD Business Partner
<b>Date of the EqlA</b>	10 <sup>th</sup> November 2025

<b>1.1 What is the main purpose of the proposed policy/project/decision and intended outcomes?</b>
<p>The purpose of the policy is to provide a structured approach to managing underperformance among employees at Bury Council. This policy aims to support employees in improving their performance to meet the required standards and to ensure fair and consistent treatment.</p> <p>The policy applies to all employees of Bury Council, excluding teachers and those in their probationary period, who are covered by a separate probationary policy.</p> <p>It is a general update to reflect changes in best practice and legislation.</p>

## Section 2 – Impact Assessment (Pages 6 to 10 of the guidance document)

<b>2.1 Who could the proposed policy/project/decision likely have an impact on?</b>
<p>Employees: <b>Yes</b></p> <p>Community/Residents: <b>No</b></p> <p>Third parties such as suppliers, providers and voluntary organisations: <b>No</b></p> <p>If the answer to all three questions is 'no' there is no need to continue with this analysis.</p>
<b>2.2 Evidence to support the analysis. Include documentary evidence, data and stakeholder information/consultation</b>
<p><b>Documentary Evidence:</b></p> <p><a href="https://www.bury.gov.uk/asset-library/employment-equality-report-2023.pdf">https://www.bury.gov.uk/asset-library/employment-equality-report-2023.pdf</a></p>
<p><b>Data:</b></p> <p>See above link</p>
<p><b>Stakeholder information/consultation:</b></p> <p>Unison, Employment panel, Managers across a number of departments, the Council's Employment Lawyer and the Council's Equality, Diversity and Inclusion Manager</p>
<b>2.3 Consider the following questions in terms of who the policy/project/decision could potentially have an impact on. Detail these in the impact assessment table (2.4) and the potential impact this could have.</b>
<ul style="list-style-type: none"> <li>• Could the proposal prevent the promotion of equality of opportunity or good relations between different equality groups?</li> <li>• Could the proposal create barriers to accessing a service or obtaining employment because of a protected characteristic?</li> <li>• Could the proposal affect the usage or experience of a service because of a protected characteristic?</li> <li>• Could a protected characteristic be disproportionately advantaged or disadvantaged by the proposal?</li> <li>• Could the proposal make it more or less likely that a protected characteristic will be at risk of harassment or victimisation?</li> <li>• Could the proposal affect public attitudes towards a protected characteristic (e.g. by increasing or reducing their presence in the community)?</li> <li>• Could the proposal prevent or limit a protected characteristic contributing to the democratic running of the council?</li> </ul>

2.4 Characteristic	Potential Impacts	Evidence (from 2.2) to demonstrate this impact	Mitigations to reduce negative impact	Impact level with mitigations Positive, Neutral, Negative
<b>Age</b>	As people get older there may have more issues with performance		Manager to work with employees to identify workplace adjustments Support for implementing workplace adjustments to be included in briefing and training	Neutral
<b>Disability</b>	More likely to have performance issues due to a disability. May not be able to access policy.		Manager to work with employees to identify workplace adjustments. Support for implementing workplace adjustments to be included in briefing and training Staff who cant access the policy on line can ask their manager for a copy	Neutral
<b>Gender Reassignment</b>	No impact			Neutral
<b>Marriage and Civil Partnership</b>	No impact			
<b>Pregnancy and Maternity</b>	More likely to have performance difficulties		Manager to work with employees to identify workplace adjustments	Neutral

			Support for implementing workplace adjustments to be included in briefing and training	
<b>Race</b>	Some ethnic groups may have performance difficulties May not be able to access policy due to limited understanding of English.		Manager to work with employees to identify workplace adjustment Support for implementing workplace adjustments to be included in briefing and training Manager would work with staff member on the most appropriate form of communication.	Neutral
<b>Religion and Belief</b>	Cultural and religion instructions may sometime lead to performance issues		Manager to work with employees to identify workplace adjustments Support for implementing workplace adjustments to be included in briefing and training	Neutral
<b>Sex</b>	Some women may have a period in their time when certain conditions may cause		Manager to work with employees to identify workplace adjustments Support for implementing	Neutral

	symptoms which may affect performance.		workplace adjustments to be included in briefing and training	
<b>Sexual Orientation</b>	No impact			Neutral
<b>Carers</b>	Potential struggles to achieve work-life balance which may lead to performance issues		Workplace adjustment and flexible working options would be considered. Training for managers is available. Support for employees in successfully combining work and caring responsibilities is available including a Carers passport	Neutral
<b>Looked After Children and Care Leavers</b>	Potential struggles to achieve work-life balance which may lead to performance issues		Workplace adjustment and flexible working options would be considered. Training for managers is available. Support for employees in successfully combining work and caring responsibilities is available including a Carers passport	Neutral
<b>Socio-economically vulnerable</b>	Maybe more prone to issues with performance		Workplace adjustment and flexible working options would be	Neutral

			considered. Training for managers is available. Support for employees in successfully combining work and caring responsibilities is available including a Carers passport	
<b>Veterans</b>	Maybe more prone to performance issues		Workplace adjustments would be discussed	Neutral

#### **Actions required to mitigate/reduce/eliminate negative impacts or to complete the analysis**

<b>2.5 Characteristics</b>	<b>Action</b>	<b>Action Owner</b>	<b>Completion Date</b>
Front line workers	Front line staff who do not regularly have access to laptops will have access to the policy via their manager or HR.	HRBP	December 2025
All	Training for line managers and staff briefings	HRBP	December 2025
All	Training/briefing to include new workplace adjustment guidance	HRBP	December 2025

### **Section 3 - Impact Risk**

Establish the level of risk to people and organisations arising from identified impacts, with additional actions completed to mitigate/reduce/eliminate negative impacts.

#### **3.1 Identifying risk level (Pages 10 - 12 of the guidance document)**

Impact x Likelihood = Score			Likelihood			
			1	2	3	4
			Unlikely	Possible	Likely	Very likely
Impact	4	Very High	4	8	12	16
	3	High	3	6	9	12
	2	Medium	2	4	6	8
	1	Low	1	2	3	4
	0	Positive / No impact	0	0	0	0

<b>Risk Level</b>	<b>No Risk = 0</b>	<b>Low Risk = 1 - 4</b>	<b>Medium Risk = 5 – 7</b>	<b>High Risk = 8 - 16</b>
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<b>3.2 Level of risk identified</b>	0
<b>3.3 Reasons for risk level calculation</b>	No impact

#### Section 4 - Analysis Decision (Page 11 of the guidance document)

<b>4.1 Analysis Decision</b>	<b>X</b>	<b>Reasons for This Decision</b>
There is no negative impact therefore the activity will proceed	x	The activity will proceed
There are low impacts or risks identified which can be mitigated or managed to reduce the risks and activity will proceed		

There are medium to high risks identified which cannot be mitigated following careful and thorough consideration. The activity will proceed with caution and this risk recorded on the risk register, ensuring continual review		
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## Section 5 – Sign Off and Revisions (Page 11 of the guidance document)

5.1 Sign Off	Name	Date	Comments
Lead Officer/SRO/Project Manager			
Responsible Asst. Director/Director			
EDI	L. Cawley	11/11/25	QA Complete. The analysis has identified and mitigated potential impacts across several characteristics. Mitigations in place ensure neutral impacts by ensuring additional support measures and adjustments are applied where appropriate.

## EqIA Revision Log

5.2 Revision Date	Revision By	Revision Details