

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)

Name of Policy/Project/Decision	Employee Code of Conduct
Lead Officer (SRO or Assistant Director/Director)	Tim Normanton
Department/Team	HR & OD
Proposed Implementation Date	September 2025
Author of the EqIA	Andrew Smith
Date of the EqIA	04/08/2025

1.1 What is the main purpose of the proposed policy/project/decision and intended outcomes?

The Code of Conduct outlines the expected standards of behaviour, values, and ethical principles for all employees of Bury Council. It ensures employees act with integrity, impartiality, and professionalism, fostering trust with residents, elected members, and colleagues. The Code covers areas such as political neutrality, safeguarding, equality, declarations of interest, conduct, and whistleblowing.

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

2.1 Who could the proposed policy/project/decision likely have an impact on?

Employees: **Yes/No (state reasons for answering 'no')**

Community/Residents: **Yes/No (state reasons for answering 'no')**

Third parties such as suppliers, providers and voluntary organisations: **Yes/No (state reasons for answering 'no')**

If the answer to all three questions is 'no' there is no need to continue with this analysis.

2.2 Evidence to support the analysis. Include documentary evidence, data and stakeholder information/consultation

Documentary Evidence:

- Bury Council Employee Code of Conduct (2025)
- Local Government Act 1972 and 1989
- Localism Act 2011
- Nolan Principles of Public Life
- Council's Whistleblowing Policy
- Health and Safety Policy

Data:

Stakeholder information/consultation:

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.

- Could the proposal prevent the promotion of equality of opportunity or good relations between different equality groups?
- Could the proposal create barriers to accessing a service or obtaining employment because of a protected characteristic?
- Could the proposal affect the usage or experience of a service because of a protected characteristic?
- Could a protected characteristic be disproportionately advantaged or disadvantaged by the proposal?
- Could the proposal make it more or less likely that a protected characteristic will be at risk of harassment or victimisation?
- Could the proposal affect public attitudes towards a protected characteristic (e.g. by increasing or reducing their presence in the community)?
- Could the proposal prevent or limit a protected characteristic contributing to the democratic running of the council?

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
Age	Neutral impact; applies equally to all ages.	Code is universal in application.	None needed.	Neutral
Disability	Risk of indirect disadvantage if policies are not provided in accessible formats.	Council's reasonable adjustment duty.	Ensure accessible versions (e.g., Easy Read, screen-reader friendly).	Neutral
Gender Reassignment	Potential for harassment if protections not explicitly upheld.	EDI commitments in Code.	Strengthen awareness via training.	Neutral
Marriage and Civil Partnership	No differential impact identified.	Applies equally regardless of status.	None needed.	Neutral
Pregnancy and Maternity	May require additional flexibility under	Employee rights protected by law.	Ensure Code does not conflict with maternity protections.	Neutral

	Code (e.g., for breaks, time off).			
Race	Positive – promotes inclusive behaviours and respect for diversity.	EDI section and Nolan Principles.	Reinforce via anti-racism training.	Positive
Religion and Belief	Neutral – but ensure policies do not unintentionally restrict religious expression.	Code avoids reference to specific customs.	Encourage flexible observance practices.	Neutral
Sex	Neutral – gender-balanced language used throughout.	HR and policy reviews.	Monitor application of disciplinary outcomes by gender.	Neutral
Sexual Orientation	Positive – supports inclusive culture and reporting of harassment.	Nolan Principles; Whistleblowing policy.	Promote allyship and reporting mechanisms.	Positive
Carers	Risk of indirect discrimination due to rigid conduct expectations.	Employees' needs for flexibility.	Reiterate flexible working policy links.	Neutral

Looked After Children and Care Leavers	No direct impact; potential to reinforce inclusive practice.	Policy is employee-focused.	Highlight support options in induction.	Neutral
Socio-economically vulnerable	Neutral – no fees or penalties included.	Applies universally.	Reinforce support services for financial wellbeing.	Neutral
Veterans	Potential for positive impact if experience valued.	No specific references.	Signpost veteran support policies where applicable.	Neutral

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

2.5 Characteristics	Action	Action Owner	Completion Date
Disability	Ensure Code is published in accessible formats (PDF/Audio/Text)	Communications/EDI	Sept 2025
Race, Sexual Orientation	Promote inclusive culture via staff training	HR/L&D	Ongoing
Carers	Cross-reference with Flexible Working policy	Policy Team	Sept 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)

	Likelihood
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Impact x Likelihood = Score		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

Risk Level	No Risk = 0	Low Risk = 1 - 4	Medium Risk = 5 – 7	High Risk = 8 - 16
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3.2 Level of risk identified	Low
3.3 Reasons for risk level calculation	The Code is designed to promote fairness and integrity. Low risks around accessibility and unconscious bias remain but can be mitigated by existing HR/EDI policies.

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

4.1 Analysis Decision	X	Reasons for This Decision
There is no negative impact therefore 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	X	While the Code is comprehensive and inclusive, minor risks (e.g., access to information or unconscious bias in disciplinary actions) can be

	mitigated through good communication, training, and monitoring.
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	

Section 5 – Sign Off and Revisions (Page 11 of the guidance document)

5.1 Sign Off	Name	Date	Comments
Lead Officer/SRO/Project Manager	Andrew Smith	04/08/2025	
Responsible Asst. Director/Director			
EDI			

EqIA Revision Log

5.2 Revision Date	Revision By	Revision Details