

# Equality Impact Assessment (EIA)

Legislation requires that our policy documents consider the potential to affect groups differently and eliminate or minimise this where possible. This process helps address inequalities by identifying steps to ensure equal access, experience, and outcomes for all groups of people.

## Step One – Policy Definition

<b>Function/policy name and number:</b>	Annual Leave Policy (Non-Medical Staff)
<b>Main aims and intended outcomes of the function/policy:</b>	<p>The Annual Leave Policy sets out a consistent and equitable framework for the calculation, authorisation, and recording of annual leave and public holiday entitlements for non-medical employees employed under Agenda for Change terms and conditions.</p> <p>The intended outcomes are to:</p> <ul style="list-style-type: none"> <li>• Ensure compliance with employment law, Agenda for Change, and Working Time Regulations</li> <li>• Promote employee wellbeing by encouraging the taking of annual leave</li> <li>• Support operational service delivery through effective workforce planning</li> </ul> <p>Ensure fair and equitable treatment of all staff regardless of working pattern or contractual status</p>
<b>How will the function/policy be put into practice?</b>	The policy will be implemented by line managers through local leave-booking arrangements, supported by electronic systems (ESR/Allocate). Human Resources will provide advice and guidance, and managers will be responsible for applying the policy consistently and fairly, including consideration of reasonable adjustments where appropriate.
<b>Who will be affected/benefit from the policy?</b>	All non-medical employees of The Dudley Group NHS Foundation Trust who are employed under Agenda for Change terms and conditions.
<b>State the type of document:</b>	Policy
<b>Is an EA required?</b> NB: Most policies/functions will require an EA with a few exceptions, such as routine procedures-see guidance attached	Yes
<b>Accountable Director:</b> (Job Title)	Chief People Officer
<b>Assessment Carried out by:</b>	Deputy HRBP
<b>Date Completed:</b>	January 2026

To help you to determine the impact of a strategy or policy, think about how it relates to the Public Sector Equality Duty, the key questions as listed below and prompts for each protected characteristic are included Step 3:

- Eliminate unlawful discrimination, victimisation, and harassment
- Advancing equality of opportunity
- Fostering good community relations

### KEY QUESTIONS

- Are people with protected characteristics likely to be affected differently even though the policy is the same for everyone?
- Could there be issues around access, differences in how a policy is experienced and whether outcomes vary across groups?
- What information /data or experience can you draw on to indicate either positive or negative impact on different groups of people in relation to implementing this function policy?

## Step Two – Evidence & Engagement

<b>Research/Publications</b> <i>(List any publications or research you have looked at here)</i>
<ul style="list-style-type: none"> <li>• NHS Terms and Conditions of Service Handbook (Agenda for Change – Section 13)</li> <li>• Working Time Regulations 1998 &amp; Working time (amendment) Regulations 2007</li> <li>• ACAS guidance on annual leave and holiday entitlement</li> <li>• NHS Employers guidance on annual leave, sickness and family leave</li> </ul>
<b>Working Groups</b> <i>(Have you consulted with any groups?)</i>
<ul style="list-style-type: none"> <li>• HR Operations Team</li> <li>• Staff representation committee (SRC)</li> <li>• Joint Local Negotiating Committee (JLNC)</li> <li>• Previous policy feedback and employee queries</li> <li>• Consideration of workforce equality and staff network review and feedback</li> </ul>
<b>Clinical or Subject Experts</b> <i>(Have you consulted any experts? List them here)</i>
N/A
<b>Engagement Activity Focused on Protected Groups</b> <i>(Age, disability, race, sex, gender reassignment, marriage &amp; civil partnership, pregnancy &amp; maternity, religion or belief, sexual orientation, Other marginalised groups e.g. Homeless people or anything privacy or dignity related)</i>
Name of Source: Wider HR Team Date: June 2025 Protected Characteristic: All
Name of Source: Head of People - Workforce, Wellbeing and Employee Relations Date: September 2024 Protected Characteristic: All
Name of Source: Equalities HR Business Partner Date: January 2025 Protected Characteristic: All

Name of Source: Divisional Leads – All divisions. Date: January 2025 Protected Characteristic: All
Name of Source: Trust Staff Networks (Disability, EmBRACE, LGBTQ+, Women's) Date: January 2025 Protected Characteristic: All

**Summary of the feedback received from the engagement activity focused on protected groups:**

- Additional information to cover supporting staff wellbeing.
- Include information around utilisation of Annual Leave to support employee wellbeing.
- Review wording and terminology to read in a more appropriate language.
- Add anti-discrimination statement.
- Ensure references to leave entitlement are all listed in hours consistently. Remove references to any entitlements in calendar days.
- Additional clarity around a manager's responsibility for appropriate timescales for response to leave requests.
- Provide clarity around leave considerations around service needs.

## Step Three – Assessment of Impact

Complete **relevant** boxes below to help you record your assessment.

Consider information and evidence from the previous section covering:

- Engagement activities
- Equalities monitoring data
- Wider research

Also, consider due regard under the general equality duty, the NHS Constitution and Human Rights.

### What detail is required below:

A negative impact requires every box to be completed

Positive impacts need the first three boxes completed

Neutral impacts need to be marked neutral with no other details.

<b>Age:</b> Describe age-related impact and evidence. This can include safeguarding, consent and welfare issues:	
<b>Positive, negative or neutral impact:</b>	Neutral Impact

<b>Disability:</b> Describe disability related impact and evidence. This can include attitudinal, physical, communication and social barriers, as well as mental health/ learning disabilities, cognitive impairments	
<b>Positive, negative or neutral impact:</b>	Positive
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Medium
<b>Concern or Benefit</b>	Supporting reasonable adjustments through flexible management of leave requests

<b>Gender re-assignment:</b> Describe any impact and evidence on transgender people. This can include issues such as privacy of data and harassment:	
<b>Positive, negative or neutral impact:</b>	Neutral Impact

<b>Marriage and civil partnership:</b> Describe any impact and evidence in relation to marriage and civil partnership. This can include working arrangements, part-time working, and caring responsibilities:	
<b>Positive, negative or neutral impact:</b>	Neutral Impact

<b>Pregnancy &amp; Maternity:</b> Describe any impact and evidence on pregnancy and maternity. This can include working arrangements, part-time working, and caring responsibilities:	
<b>Positive, negative or neutral impact:</b>	Positive
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	High
<b>Concern or Benefit</b>	Staff continue to accrue statutory and contractual annual leave during maternity, adoption, paternity and shared parental leave. The policy supports taking accrued leave before or after leave periods in agreement with managers.

<b>Race:</b> Describe race-related impact and evidence. This can include information on different ethnic groups, Roma gypsies, Irish travellers, nationalities, cultures, and language barriers:	
<b>Positive, negative or neutral impact:</b>	Neutral Impact

<b>Religion or Belief:</b> Describe any religion, belief or no belief impact and evidence. This can include dietary needs, consent and end-of-life issues:	
<b>Positive, negative or neutral impact:</b>	Positive
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Low
<b>Concern or Benefit</b>	The policy allows flexibility in requesting leave, supporting religious observations and cultural needs where operationally possible.

<b>Sex:</b> Describe any impact and evidence on men and women. This could include access to services and employment:	
<b>Positive, negative or neutral impact:</b>	Positive

<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Low
<b>Concern or Benefit</b>	The policy supports work-life balance for all employees. Calculation of leave in hours ensures equitable treatment regardless of working pattern, benefiting a workforce with a high proportion of women and part-time employees.

<b>Sexual Orientation:</b> Describe any impact and evidence on heterosexual people as well as lesbian, gay and bisexual people. This could include access to services and employment, attitudinal and social barriers:	
<b>Positive, negative or neutral impact:</b>	Neutral Impact

<b>Other marginalised groups, e.g. Homeless people:</b> Describe any impact and evidence on groups experiencing disadvantage and barriers to access and outcomes. This can include lower socio-economic status, resident status (migrants, asylum seekers), homeless, looked after children, single parent households, victims of domestic abuse, victims of drugs / alcohol abuse: (This list is not exhaustive)	
<b>Positive, negative or neutral impact:</b>	Positive
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Low
<b>Concern or Benefit</b>	Flexible approach to annual leave, purchasing additional leave, and sickness-related carry-over supports staff with caring responsibilities or complex personal circumstances.

<b>Privacy, dignity, respect, fairness etc:</b>	
<b>Positive, negative or neutral impact:</b>	Neutral Impact

## Step Four – Assurance

This section must be approved by a senior member of staff, such as a head of department or higher.

<b>Title</b>	Group Associate Director of People Delivery
<b>Date</b>	05/02/2026

