TITLE: Performance Management Policy

Section responsible: HR

Officers responsible for Screening: Tracy Walters

Date of Screening: 22 December 2025

Subject matter: Tracy Walters

Background

The Council is committed to ensuring that all policies and procedures promote equality, diversity, and inclusion while meeting organisational objectives. Equality Impact Assessments (EQIAs) are carried out to examine whether policies have the potential to affect different groups in different ways, either positively or negatively. This ensures compliance with the Equality Act 2010 and supports the Council's Public Sector Equality Duty to eliminate discrimination, advance equality of opportunity, and foster good relations across all protected characteristics.

This EQIA covers the performance management HR policy, which set out a consistent and supportive approach for managing employee performance.

Communication with staff:

Skills byte sessions, All staff communication, Intranet

Equalities Impact Assessment – Initial Screening

Stage 1: Initial Screening of proposals

Section 1: About this EIA initial screening	
Name of the activity being screened:	Performance Management Policy
Type of activity being screened:	Policy
Business Area	HR

Name of screening officer:	Tracy Walters
Date of screening:	22 December 2025
Sign off by Project Sponsor	**Bal Toor**
Sign off by council equality lead:	**Christine Ford**

Section 2: Information about the policy change	
1. Briefly describe the aims, objectives and purpose of this activity.	Outlines the approach for addressing situations where an employee is unable to carry out their role effectively. The policy sets out expectations for when an employee cannot fulfil their role and steps to be taken if performance does not improve.
2. Who a) implements and b) is responsible for this activity?	Tracy Walters -Implementation

All line managers are responsible for the application of the absence management policy |
| 3. What are the desired outcomes? | To handle all cases consistently, fairly and without discrimination, in line with Council's equality, diversity & inclusion commitments.

Ensure employees understand what is expected of them and have the opportunity to meet those expectations.

To provide a clear and structured process for addressing and improving underperformance when it occurs.

To ensure repeated or prolonged underperformance is dealt with formally and not allowed to continue indefinitely. |
| 4. Who is expected to benefit from this activity and in what way? | Employees: will benefit from clear understanding of what is required in their role which will help prevent confusion and anxiety around performance. Those underperforming will receive structured guidance, support and opportunity to improve.

Managers: Will benefit from a structured, step-by-step process for addressing underperformance, with clear guidance on when and how to escalate to formal procedures. Reducing the risk for bias and unfair treatment.

SBC: Gains improved overall workforce performance as clear processes help ensure employees are meeting required standards & supporting |

	organizational effectiveness. Improves the risk of disputes or grievances as a transparent, non-discriminatory approach helps safeguard the Council from legal and employee related risks. Residents/Service Users: Will receive better quality services when employees are supported to perform effectively, service delivery to residents will improve. Addressing underperformance will help maintain standards and ensure residents receive timely and accurate support.
5. Who are the main stakeholders in relation to this activity?	All employees

Section 3: Identifying and assessing equality impacts

An equalities analysis of the staff in the scope of change

6a. Have the results of the equalities analysis shown that any particular equality group(s) will be disproportionately affected by this change? Please explain and provide evidence to support your response.	We do not feel that there is any evidence to suggest any particular equality group will be disproportionately affected by this policy. This policy is designed to apply consistently to all employees and set out a clear and structured approach for managing underperformance. It emphasises that all cases will be handled in a non-discriminatory manner and in accordance with SBC's Equality Diversity and Inclusion Policy, which reduces the risk of disproportionate impact on protected groups. The policy focuses on capability and performance and not personal characteristics. Underperformance is defined around expectations, clarity of role and skills and not factors linked to any protected groups. The policy also includes safeguards such as a requirement to handle all cases consistently, commitment to non-discriminatory practices and alignment with our Equity, Diversity & Inclusion standards. We have also carved out that employees new to the organization are excluded because they are managed under a separate probation policy. While no disproportionate impact has been identified it would be good practice to monitor if employees with disabilities require reasonable adjustments to meet performance expectations.
7a Who will be consulted on this change?	CLT, TU, Networks, Employment Committee
8a During consultation, were any equality concerns raised by stakeholders? If so, please briefly explain the issue(s).	Not applicable
9a. If one or more groups is likely to be disproportionately affected, are there any mitigating actions that	Although the policy is designed to apply consistently to all directly employed staff and there is no evidence that any particular equity group will be disproportionately affected, we can recognise that some groups may be more vulnerable to performance-related concerns due to factors lined with protected characteristics such as disabilities affecting work

can be taken to address this? Please explain	capacity, communication barriers, neurodiversity or long term health conditions.
	The following mitigating actions can be put in place to ensure no groups are unfairly disadvantaged.
	Ensuring reasonable adjustments are considered and documented. Especially for employees with disabilities or long-term health conditions, managers should explore and implement reasonable adjustments before progressing to any formal performance steps.
	Providing enhanced clarity and communication support for employees who may experience communication barriers such as employees for whom English may not be their first language, employees with neurodiverse conditions or those with certain disabilities. This additional support could be provided through written or verbal explanations of expectations, additional support to understand requirement standards or the opportunity to ask questions and confirm understanding, which will help to ensure underperformance is not caused by lack of clear communication.
	Mangers should receive regular training on applying the policy consistently, understanding the impact of protected characteristics on performance, recognising unconscious bias and knowing when to seek HR guidance.

6b What are the potential equalities impacts of the proposed activity? Please complete the table below.

Equality group	Is there a negative/ adverse impact?		
Age:		No	
Disabled staff or those with mobility requirements	Yes		There could be some risks or challenges faced if the appropriate safeguards are not in place and reasonable adjustments are not made early. This risk highlights the

			importance of embedding reasonable adjustment considerations at every stage of the process.
Ethnic groups		No	
Gender		No	
Pregnancy and Maternity		No	
Gender Reassignment		No	
Marriage and civil partnerships		No	
Religious/ Faith groups		No	
Sexual Orientation		No	
7b. Can the negative/adverse impact(s) highlighted be justified on the grounds of promoting equality of opportunity for one group? Or any other reason? Please explain	Any potential negative or adverse impacts identified cannot be justified on the grounds of promoting equality of opportunity for one group over another. The purpose of this policy is not to favour or prioritise any specific equality group but to provide a fair, transparent and consistent approach to managing under performance across all directly employed staff. The Council is required to ensure that employees are performing to the required standards to deliver effective services. Setting clear expectations and providing structured support. The policy applies consistently to all employees regardless of their protected characteristics and not part of the policy is intended to create differential treatment of one equality group over another. The policy is in line with our Equity, Diversity & Inclusion principals and any potential adverse impacts must be identified and mitigated where possible through things such as reasonable adjustments.		
8b. **There are no negative / adverse impact(s)** If you have not identified any negative/ adverse	n/a		

impacts please briefly explain your answer, providing evidence.		
9b. **Have any <u>positive</u> impact(s) been identified?** If you have identified any positive impact(s) please briefly explain your answer, providing evidence.	Yes, several positive equality impacts have been identified. The policy is designed to support fair, consistent and transparent management of underperformance, which can have beneficial outcomes for employees and for equity, diversity and inclusion across the organisation. The policy is creating consistent and fair treatment for all staff, clear expectations that will help reduce ambiguity and potential bias and early support for employees who may lack clarity or skills.	

Section 4: Next Steps

10. What data will be used to monitor the future impact of this policy? What are the future monitoring arrangements?	SBC workforce data (age, gender, disability, ethnicity). Workforce data is developed each month and cascaded with directorates with support from HR.	
11. What is the date of the next review?	18 months from now	