

Heriot-Watt University: Equality and Privacy Impact Assessment Form									
School	HWU-Wide (for UK Campuses only)	Area	HWU-Wide (for UK Campuses only)	Person responsible for the assessment	Director of HRD	Date of EIA			October 2016 refreshed December 2021
Name of the Policy/Process to be assessed.			Management of Organisational Change Policy	Is this a new or existing policy? (please circle)	NEW	EXISTING but updated	Does the policy impact on people?	Yes	No (No EIA required go to Q 14)
1. Briefly describe the aims, objectives and purpose of the policy.			<p>As part of delivering the University strategy, the University aims to continue to develop as a high performing, rapidly growing, and financially sustainable university and through careful forward planning to safeguard the current and future employment of all staff through the changes ahead. It recognises that a period of change can be a difficult one for all colleagues and will endeavour to ensure appropriate support both to individuals affected by a change process and managers implementing change.</p> <p>This Management of Change Policy is the overarching Managing Change Policy and comes with a suite of supporting policies and procedures to ensure appropriate mechanisms are in place to identify the need for change and to effectively manage any transition.</p>						

<p>2. Are there any associated objectives of the policy, please explain.</p>	<p>The key principles and objectives underpinning this suite of policies are to ensure:</p> <ul style="list-style-type: none"> • Full open consultation with staff and trade unions at the earliest stage • Continuing to build and support relationships between management and trade unions • Clear communication processes • Compliance with the University charter, statutes and ordinances • Compliance with employment law • Commitment to our Equal Opportunities Policy
<p>3. Who is intended to benefit from the policy and in what way?</p>	<ul style="list-style-type: none"> • All existing and new employees • HWU business and strategy • Effectiveness in delivering our functions • Student experience - due to above
<p>4. Is any data available about the policy, e.g., feedback from users?</p>	<p>This EPIA was reviewed at the same time as the suite of Managing Change Policies in 2016/2017 and revisited in 2020. A number of lessons learned reviews from major change initiatives and feedback from the trade Unions, staff and HD colleagues were incorporated at that time. Further reviews will be undertaken in light of lessons learned from 2020 VR programme</p>
<p>5. What outcomes are wanted from this policy?</p>	<ul style="list-style-type: none"> • That our approach to managing organisational change is open, consistent and fair • Our processes are free from any discriminatory practice or outcomes: no group or individual should be subjected to unlawful treatment as a result of change management

<p>6. What factors/forces could contribute/detract from the outcomes?</p>	<ul style="list-style-type: none"> • Underpinning procedures and guidance must be well communicated and understood by those implementing management of organisational change at the University • There is a need to ensure that Directors, Heads of School/any individual overseeing management of change must adhere to the principles outlined in this policy and behave consistently with the University's values • There is a need to make sure that all those affected by a change programme are involved and included. This include taking additional action where employees may be part-time, away from work due to maternity, paternity or sickness absence (or secondment) – communication, involvement and being responsible to team/individual circumstance will support a successful change programme 	
<p>7. The Equality Act 2010 includes a requirement to give 'due regard' to the public sector equality duty (PSED) in all functions. There is a specific duty to assess the impact of proposed new or revised policies and practices against three needs of the general duty. Use this section to outline relevant issues.</p>		
<p>PUBLIC SECTOR EQUALITY DUTY: EQUALITY ACT 2010</p>		
<p>Eliminate unlawful discrimination, harassment and victimisation</p>	<p>Advance equality of opportunity between people of different groups</p>	<p>Foster good relations between people of different groups</p>
<p>Fairness and transparency should be at the heart of organisational change, no group or individual should be subjected to unlawful treatment</p>	<p>Employee consultation and involvement with Trade Unions will assist in advancing equality and diversity goals ensuring raised awareness of the needs of different groups are part of managing change</p>	<p>Employee consultation and involvement with Trade Unions will assist in understanding where there may be a need to take more action to ensure or improve relationships during a change period.</p>
<p>Our Policy and its implementation should take account of personal circumstances to ensure involvement of all relevant individuals and therefore enable changing timescale etc to meet the needs of some PC groups such as: maternity, paternity, Disability - or where necessary sickness absence related leave or secondment etc. to ensure no discriminatory practices take place.</p>		
<p>8. Do you have any concerns that the policy could have a differential impact on any of the Protected Characteristic groups*? Detail any relevant information.</p>	<p>No: any change supported through this policy will be focused on business requirements and fit for purpose structures. No outcomes will impact negatively on individual to groups linked to the Protected Characteristics.</p> <p>There will be little 'personal' data collected but personal information would be pertinent to how we best manage change.</p>	

<p>9. What are the risks associated with the policy in relation to differential impact?</p>	<p>If the University does not follow the policy, we could be open to litigation if the Management of Organisational Change policy and guidance prove to be discriminatory. However, the guidance and templates which are openly available should ensure that this doesn't happen.</p>			
<p>10. Could the differential impact identified in 6-11 amount to there being the potential for adverse impact in this policy? If no, outline why and go to question 12.</p>	<p>YES</p>	<p>NO</p>	<p>Please Explain</p>	<p>There is a need to enable a degree of flexibility in implementation of the policy to ensure we take account of personal circumstances and ensure no unfair detriment is incurred – resulting in an adverse differential impact.</p>
<p>11. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or any other reason.</p>	<p>YES</p>	<p>NO</p>	<p>Please Explain</p>	<p>There may be differential impact in application of the policy to take account of personal circumstances and ensure no unfair detriment is incurred. There may be times around communication and consultation where timescales could be impacted on to ensure inclusion of all necessary individuals/teams thus promoting access to shaping any outcomes.</p>
<p>12. Demonstrate how you have involved stakeholders in the EIA.</p>	<p>Trade Unions were consulted on the content of the Policies and Procedures and throughout each change management programme. HRD colleagues in Operations. Professional & Organisational Development and Reward and Wellbeing have been consulted.</p>			
<p>13. Date EIA Completed.</p>	<p>14/10/16</p>		<p>14. Date for future review of policy/function.</p>	<p>Refreshed Dec 21, further review to take place</p>

* It may be beneficial to give particular consideration to the Protected Characteristic groups in your impact assessment. The Protected Characteristics covered by the Equality Act 2010 are: Age, Disability, Race, Religion and Belief (including no belief), Sex, Sexual Orientation, Pregnancy and Maternity, Gender Reassignment, Marriage and Civil Partnership

Privacy Impact Assessment					
14. Does implementation of the policy or procedure <i>necessitate</i> processing information about people who can be identified from that information or in combination with other information	YES	NO (No PIA required)	Please summarise the categories, if not listed in 15, below	Maternity, paternity any other absence	
15. Does implementation of the policy or procedure <i>necessitate</i> processing sensitive or otherwise confidential personal data? Please highlight any affected categories	Physical or mental health	Political or Trade Union Belief	Sexual life	Proven or alleged offences	Other – please Specify below
	Race or ethnic origin	Religion and belief (including lack of belief)	Gender Reassignment	Information that could be used to commit identity fraud	Maternity, Paternity etc Leave
Please summarise any other information processed that would cause significant damage or distress to people if disclosed without their consent	<p>Management of change involves exploring structures, teams and ways of working. This means that roles are considered and while this is a 'technical' exercise there are times when the individuals in roles will be the subject of our processes. However, data I not gathered on those individuals rather there is a focus on the role.</p> <p>There will be times when personal circumstances should be considered in the way the policy is implemented to ensure open and transparent processes.</p> <p>Therefore: personal data is not held or used on the policy, however an understanding of personal circumstances enhances the ability to implement a fair procedure.</p>				
16. Have you agreed actions with the Head of Heritage and Information Governance to manage the data securely? If yes, please indicate the actions agreed	Yes	Data minimisation	Staff training	Secure communication	Disclosure/data sharing protocols
		Physical security controls	IT security	Retention policy	Secure destruction

17. Date PIA Completed	October 2016	18. Date for future review of policy/function	Refreshed Dec 2021 will be reviewed in line with policy review or new change programme
------------------------	---------------------	---	--