

Menopause at Work Policy

December 2020

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1. INTRODUCTION

Menopause is a natural stage in women's lives and women will experience it in different ways – not all have severe symptoms.

The ICB recognises that perimenopause and menopause (*hereinafter referred to as menopause*) has the potential to affect individuals in the workplace which may present issues or challenges. The ICB aims to remove the taboo surrounding it to ensure employees experiencing symptoms are supported at work.

The ICB is committed to ensuring that all employees are treated fairly and with dignity and respect at work and are taking a proactive stance by promoting a wider understanding of menopause to prevent any discriminatory or exclusionary behaviour.

This policy provides guidance to both employees who may be experiencing symptoms as well as guidance for managers to manage any issues relating to this.

2. SCOPE

This policy applies to all staff. All employees should familiarise themselves with the policy to understand the challenges people experiencing symptoms of menopause face.

3. POLICY PURPOSE AND AIMS

This policy aims to make staff aware of how menopause may affect people and the issues which may arise, as a result of those, in the workplace. This will aid in creating an environment where staff can openly raise any issues to get the right support at work.

The policy will help to ensure that staff receive sufficient support and give managers the confidence and guidance to be able to do this.

The policy details some reasonable adjustments that should be considered to help keep employees experiencing symptoms comfortable at work as well as detailing where extra support can be found.

Under the Equality Act 2010 it is the ICB's legal duty to manage age and sex related issues effectively and without discrimination, therefore the principles outlined in this policy must be followed.

4. IMPACT ANALYSIS / REGULATIONS

4.1 Equality

The ICB is committed to designing and implementing services, policies and measures

that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.

In developing and applying this policy, the ICB will have due regard to the need to eliminate unlawful discrimination, promote equality of opportunity, and foster good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.

Please see Appendix 1 for the full equality impact assessment and findings.

4.2 **Bribery Act 2010**

NHS Hull Clinical Commissioning Group has a responsibility to ensure that all staff are made aware of their duties and responsibilities arising from The Bribery Act 2010. It is therefore, extremely important that staff adhere to this and other related policies and documentation (as detailed on the ICB's website) when considering whether to offer or accept gifts and hospitality and/or other incentives.

Please see Appendix 2 for full details.

4.3 **General Data Protection Regulation (GDPR)**

The ICB is committed to ensuring that all personal information is managed in accordance with current data protection legislation, professional codes of practice and records management and confidentiality guidance. More detailed information can be found in the ICBs Data Protection and Confidentiality and related policies and procedures.

5. **NHS CONSTITUTION**

5.1 The ICB is committed to:

Designing and implementing services, policies and measures that meet the diverse needs of its population and workforce, ensuring that no individual or group is disadvantaged.

5.2 This Policy supports the NHS Constitution as follows:

The NHS aspires to the highest standards of excellence and professionalism in the provision of high-quality care that is safe, effective and focused on patient experience; in the planning and delivery of the clinical and other services it provides; in the people it employs and the education, training and development they receive; in the leadership and management of its organisations; and through its commitment to innovation and to the promotion and conduct of research to improve the current and future health and care of the population.

6. ROLES / RESPONSIBILITIES / DUTIES

6.1 Senior Leadership Team

The Senior Leadership Team will:

- Promote a fair and equitable working environment.
- Create a comfortable working environment with all the necessary facilities and amenities.
- Commit to the delivery of training and engagement for all employees in relation to menopause

6.2 HR Team

The HR Humber team will:

- Advise on the application and interpretation of this policy.
- Ensure there is a consistent application of the policy.
- Support employees and line managers on the content of this policy.

6.3 Employees

All employees are expected to:

- Familiarise themselves with this policy to raise understanding and awareness of menopause.
- Speak to their line manager if they are experiencing symptoms being as open as they feel they can be in order to receive sufficient support.
- Work with their line manager to consider and discuss solutions to help alleviate the effects that symptoms may have in the workplace, particularly if they feel their performance is suffering as a result.
- Treat everyone with dignity and respect and create an environment which reflects this.

6.4 Line Manager

Line managers are expected to:

- Familiarise themselves with menopausal symptoms and best practice guides for managers. (Please note that you are not expected to become an expert but should be able to recognise basic symptoms and their impact).
- Be as supportive as possible when issues relating to menopause are raised.
- Hold regular one to one meetings to ensure there is a constant dialogue regarding their employee's wellbeing and to give them a forum to raise any issues.
- Encourage employees to discuss their feelings as emotions can be heightened during this time.
- Undertake a risk assessment where necessary,
- Consider and implement any reasonable adjustments which would help support the employee at work and help them thrive.
- Approach conversations supportively and positively.
- Listen and take on board any feedback they receive from a delegated manager following discussions with the employee (note this will only apply when the employee has requested they discuss their symptoms with a different manager).

7. DEFINITIONS

7.1 **Menopause**

The menopause is when a woman stops having periods and is no longer able to get pregnant naturally.

The menopause is a natural part of ageing that usually occurs between 45 and 55 years of age, as a woman's oestrogen levels decline. In the UK, the average age for a woman to reach the menopause is 51 however some women experience this early.

7.2 **Peri-Menopause**

Peri-menopause is the transition stage from the onset of symptoms until 1yr after the menopause. Many people experience symptoms of menopause during this stage as symptoms generally start a few months or years before the period stops.

8. **SYMPTOMS**

Menopause affects all women differently however below are some common symptoms. The duration and severity of these symptoms varies from woman to woman however some of these can have a significant impact on someone's everyday life.

- Tired and lacking energy
- Hot flushes
- Anxiety/panic attacks/low moods
- Difficulties concentrating/forgetfulness
- Headaches/migraines
- Abdominal pain
- Difficulty sleeping
- Palpitations
- Heavy periods
- Reduced confidence

These symptoms can start years before periods stop and last on average 4 years after the last period however this can go on for much longer. This can have a significant impact on physical and mental health and wellbeing which may affect work.

It is important these symptoms are recognised and appropriate steps are taken to help people experiencing them feel more comfortable so they are better able to function both at work and home.

9. **REASONABLE ADJUSTMENTS**

Certain aspects of a job or the workplace can present a barrier for someone experiencing menopausal symptoms. If this is the case then line managers have a

responsibility to implement any reasonable adjustments that may help staff manage their symptoms at work.

Reasonable adjustments should be agreed with the employee following discussions on how their symptoms affect them at work. The Wellness Action Plan (WAP) is a useful tool to help facilitate these discussions and can provide a framework for identifying triggers, agreeing reasonable adjustments and other support required. WAP's can be accessed [here](#) or via the HR Humber team.

It is important to note that in some circumstances, conditions arising from the menopause may also meet the definition of 'impairment' under the Equality Act 2010. If there is any doubt about whether absences will qualify as an impairment under the Act, further advice and guidance should be sought from the occupational health team at the earliest opportunity.

Below are some examples of reasonable adjustments which may help:

- Encouraging the employee to work in a quiet meeting room, alone from time to time if this helps them concentrate.
- Ensuring they take short screen breaks and rests throughout the day if they experience tiredness.
- Allow for more breaks to use the washroom or toilet facilities.
- Agree for them to sit near a window or in a ventilated area or provide a desk based fan if they become hot.
- Be as flexible as possible with start and finish times, employees may feel tired in a morning or lack energy later in the day try to work around this where possible.
- Allow the employee to discuss menopause with a different delegated manager instead of their line manager should they not be comfortable discussing this with theirs. Although where possible the ICB recommends that the employee discusses this with the line manager.
- Give them flexibility to attend appointments (please see Other Leave policy).
- Provide extra support and guidance if they're struggling to concentrate or have reduced confidence.
- If their symptoms form part of a cycle, be mindful of this and review workloads to coincide with these.
- Allow them to work from home where possible, they may have had a poor night's sleep or have a heavy period.
- Agree temporary adjustments to tasks and duties that are proving a challenge.
- Agree protected time to catch up with work if required.

Should an employee hit a sickness trigger point due to menopause related absences an occupational health referral should be made. Discretion can be used in agreeing what action to take however this should be made in conjunction with

occupational health advice and in consultation with the HR Humber team to ensure a fair and consistent approach is maintained.

Occupational health advice can also be sought to get further advice on supporting someone experiencing symptoms at work.

10. **ADVICE FOR LINE MANAGERS**

- 10.1 Line managers should be both supportive and aware of menopausal symptoms so that employees do not feel embarrassed to approach them and discuss this. Having some understanding of how menopause affects people will help this, the menopause can be extremely daunting to raise with someone who has no idea about the issue.

Hold regular one-to-one meetings as part of a normal working routine, to give employees an open forum to discuss any concerns they may have. It is important you appreciate that it may be hard for them to discuss these concerns with you, try to prompt them to explain by regularly asking how they are.

Be aware that you can seek occupational health advice regarding menopause if you feel you need further advice and remind the employee that they can also self-refer to occupational health and access services such as counselling.

Should an employee feel uncomfortable discussing their symptoms with their line manager they can request a different delegated manager to do this instead. This request should only come from the employee and not the line manager and the delegated manager should feedback to the line manager so they are aware how the symptoms may be affecting the employee at work.

Managers are not expected to be an expert, one of the most valuable things a line manager can do is to listen and respond sympathetically, try to brush up on the facts, keep an open mind and show empathy in understanding what they are going through.

If the employee is experiencing psychological issues consider completing a HSE Stress Indicator Tool or Wellness Action Plan with them, these can be found online via from the HR Humber team.

Signpost to the local services (information detailed below)

10.2 **Tips on Holding Sensitive Conversations**

Following the above principles will make it much easier to have conversations with employees regarding menopause however the below points provide some further tips to holding sensitive conversations:

- Avoid interruptions
- Listen actively
- Encourage the employee to talk

- Avoid judgemental responses
- Be sympathetic
- Be calm
- Ask open ended questions

11. **ADVICE FOR STAFF EXPERIENCING SYMPTOMS OF MENOPAUSE**

Staff experiencing symptoms of menopause that are affecting them at work should try to discuss this with their manager, the more open and honest they can be the more support that can be put in place.

Staff are to be reminded that they can self-refer to occupational health for support and access services such as counselling or speak to one of the ICB's mental health first aiders. Staff should also be reminded that they can contact their GP practice should they need to and discuss treatment options with them.

It is important any staff experiencing symptoms of the menopause get sufficient rest and relaxation and drink plenty of water.

For further information on symptoms please see NHS website;
<https://www.nhs.uk/conditions/menopause/>

11.1 **Services Available**

Some employees do not need assistance during menopause and go through it without medical or alternative interventions. Some choose a treatment option and there are a few different options which the employer should support including time off for consultation and monitoring progress, please refer to the Attendance Management policy and the Other Leave policy.

Options include hormone replacement therapy (HRT), anti-depressants or anti-anxiety medications, natural treatments and remedies and lifestyle support such as diet and exercise. However, it is not the employer's role to suggest or discuss treatment options. This is a decision for the member of staff in consultation with their GP.

If advice and guidance is required, then an Occupational Health referral (either via the line manager or self-referral can be made). This can provide a gateway to other support e.g. counselling.

Employees should be reminded that they can access other NHS services such as Talking Therapy and Emotional Wellbeing services which can enable access to Cognitive Behavioural Therapy (CBT) to help people develop techniques to tackle stress and anxiety. Details on where these services can be accessed depending on location are here:

Improving Access to Psychological Therapies (IAPT)

Hull; <https://www.letstalkhull.co.uk/>

East Riding; <http://humberews.co.uk/east-riding/>

North Lincolnshire: <https://iapt.rdash.nhs.uk/how-we-can-help/the-talking-shop/>

12. ADDITIONAL GUIDANCE AND INFORMATION

- CIPD Menopause Guide
- https://www.cipd.co.uk/Images/menopause-guide_tcm18-55426.pdf

- CIPD Menopause at work – A Practical Guide for People Managers
- https://www.cipd.co.uk/Images/menopause-guide-for-people-managers_tcm18-55548.pdf

- NHS Employers: Menopause and the Workplace
- <https://www.nhsemployers.org/retention-and-staff-experience/health-and-wellbeing/taking-a-targeted-approach/taking-a-targeted-approach/menopause-in-the-workplace>

- ACAS Menopause at Work
- <https://archive.acas.org.uk/index.aspx?articleid=6752>

- NHS Website – Menopause
- <https://www.nhs.uk/conditions/menopause/>

13. IMPLEMENTATION

The Governing Body is responsible for formal approval and monitoring compliance with this policy. Following ratification the policy will be shared with staff and will be available on the website.

14. TRAINING AND AWARENESS

Advice can be sought from the HR Humber team on the implementation and interpretation of this policy.

The ICB is committed to delivering training and awareness sessions for staff and managers including facilitating Menopause cafes to provide a discussion forum for employees experiencing symptoms, their colleagues and managers.

15. MONITORING AND EFFECTIVENESS

The implementation of this policy will be monitored on an annual basis by the ICB and reported to the Senior Leadership Team.

16. POLICY REVIEW

This Policy will be reviewed within 4 years from the date of implementation.

17. REFERENCES

- Equality Act 2010
- Health and Safety at Work Act 1974
- Workplace (Health, Safety and Welfare) Regulations 1992

18. ASSOCIATED DOCUMENTATION

- Attendance Management Policy
- Other Leave Policy
- Stress Prevention and Management Policy
- HSE Stress Indicator Tool
- Wellness Action Plan

APPENDICES

- EQIA Assessment



Hull

Clinical Commissioning Group

HR / Corporate Policy Equality Impact Analysis:

Policy / Project / Function:	Menopause Policy
Date of Analysis:	24/09/2020
Completed by: (Name and Department)	Sophie Lucas, HR Humber
What are the aims and intended effects of this policy, project or function?	<p>To make managers aware of the organisational responsibility to understand the menopause and related issues.</p> <p>To raise wider awareness and remove any taboo regarding menopause and to outline support and adjustments that should be considered.</p> <p>To ensure individuals are treated fairly and with dignity and respect at work.</p> <p>Under the Equality Act 2010 it is the ICB's legal duty to manage age and sex related issues effectively and without discrimination, therefore the policy aims to ensure this duty is met.</p>
Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?	New Policy
Please list any other policies that are related to or referred to as part of this analysis	Attendance Management Other Leave
Who will the policy, project or function affect?	This policy applies to all staff. All employees should familiarise their self with the policy to understand the challenges people experiencing symptoms of menopause face.

<p>What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?</p>	<p>Policy will be shared with SLT, all staff and the SPF group with Trade Union colleagues for consultation.</p>
<p>Promoting Inclusivity and Hull ICB's Equality Objectives.</p> <p>How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation?</p> <p>How does the policy promote our equality objectives:</p> <ol style="list-style-type: none"> 1. Ensure patients and public have improved access to information and minimise communications barriers 2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone's day-to-day job 3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve 4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs 5. To demonstrate leadership on equality and inclusion and be an active champion of equalities in partnership programmes or arrangements. 	<p>Under the Equality Act 2010 it is the ICB's legal duty to manage age and sex related issues effectively and without discrimination, therefore the policy aims to ensure this duty is met by detailing reasonable adjustments which can be considered to ensure that people experiencing the menopause are made as comfortable as possible at work.</p> <p>This policy shows that NHS Hull ICB is welcoming and inclusive of people with a range of access needs and is a really proactive policy which demonstrates leadership on equality and inclusion.</p>

Equality Data

Is any Equality Data available relating to the use or implementation of this policy, project or function?

Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine *Protected Characteristics* – referred to hereafter as '*Equality Groups*'.

Examples of *Equality Data* include: (this list is not definitive)

- 1: Recruitment data, e.g. applications compared to the population profile, application success rates
- 2: Complaints by groups who share / represent protected characteristics
- 4: Grievances or decisions upheld and dismissed by protected characteristic group
- 5: Insight gained through engagement

Yes

No

Where you have answered yes, please incorporate this data when performing the *Equality Impact Assessment Test* (the next section of this document). If you answered No, what information will you use to assess impact?

Please note that due to the small number of staff employed by the ICB, data with returns small enough to identify individuals cannot be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or issues, these should be recorded in the EIA.

Assessing Impact

Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?
(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)

Protected Characteristic:	Neutral Impact	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a <i>Genuine Determining Reason</i> ¹ exists (see footnote below – seek further advice in this case)
<p>It is anticipated that these guidelines will have a positive impact as they support policy writers to complete meaningful EIAs, by providing this template and a range of potential issues to consider across the protected characteristics below. There may of course be other issues relevant to your policy, not listed below, and some of the issues listed below may not be relevant to your policy.</p>				
Gender		X		The menopause policy will primarily benefit women and ensure that they are supported at work during the menopause. It suggests reasonable adjustments to allow them to continue to perform their role.
Age		X		Menopause generally occurs when a woman is between 45 – 55 years of age although some experience this later or earlier. This policy ensure that age discrimination isn't taking place in relation to menopause by aiming to work with employees to manage their symptoms and continue in work during this stage of life.
Race / ethnicity / nationality	X			No Impact
Disability		X		Menopause can be considered a disability in some circumstances and this policy will

1. ¹ The action is proportionate to the legitimate aims of the organisation (please seek further advice)

				ensure that these employees are supported at work and will meet the requirements under the Equality Act.
Religion or Belief	X			No Impact
Sexual Orientation	X			No Impact
Pregnancy and Maternity	X			No Impact
Transgender / Gender reassignment		X		There may be some men who are experiencing menopause symptoms during or following a gender reassignment and this policy will ensure this is dealt with confidentially and that the employee is treated with dignity and respect.
Marriage or civil partnership	X			No Impact

Action Planning:

As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
The policy may not be accessible to people with communications barriers.	The ICBs internal 'portal' and external website signpost individuals to alternative formats such as large print, braille or another language.	ICB Communications	Updating of this facility is ongoing	Next Policy Review - November 2021

Sign-off

All policy EIAs must be signed off by Sue Lee, Associate Director of Communications and Engagement

I agree with this assessment / action plan

If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales:



Signed:

Date: 18.11.20

APPENDIX 2

Bribery Act 2010:

Under the Bribery Act 2010, it is a criminal offence to:

- Bribe another person by offering, promising or giving a financial or other advantage to induce them to perform improperly a relevant function or activity, or as a reward for already having done so; and
- Be bribed by another person by requesting, agreeing to receive or accepting a financial or other advantage with the intention that a relevant function or activity would then be performed improperly, or as a reward for having already done so.
- Failure to prevent bribery; The Bribery Act also introduced a corporate offence for a relevant commercial organisation (the ICB) to bribe another person intending (1) to obtain or retain business, or (2) to obtain or retain an advantage in the conduct of business. The only defence available to the ICB against Bribery Act offences would be to prove that it had adequate procedures in place designed to prevent persons associated with it from undertaking any of the conduct outlined above.

These offences can be committed directly or by and through a third person and, in many cases, it does not matter whether the person knows or believes that the performance of the function or activity is improper.

It is therefore, extremely important that staff adhere to this and other related policies and documentation (as detailed on the ICB's website) when considering whether to offer or accept gifts and hospitality and/or other incentives.

If fraud, bribery and corruption are particularly relevant to a policy, the section should be headed Anti-fraud, Bribery and Corruption and should include a cross reference to the Local Anti-fraud, Bribery and Corruption Policy. The following wording should also be included:

'If an employee suspects that fraud, bribery or corruption has taken place, they should ensure it is reported to the Local Counter Fraud Specialist (LCFS) and/or to NHS Counter Fraud Authority (NHSCFA) as follows:

- Local Counter Fraud Specialist on 07872 988939 / email nikki.cooper1@nhs.net or Head of Anti-Crime Services on 07717 356707 / email steven.moss@nhs.net.
- The ICB's Chief Finance Officer,
- NHSCFA, 0800 028 40 60 (powered by Crimestoppers)
- Online: <https://cfa.nhs.uk/reportfraud>.'

For further information see <http://www.justice.gov.uk/guidance/docs/bribery-act-2010-quick-start-guide.pdf>. If you require assistance in determining the implications of the Bribery Act please contact the LCFS on the details above.