

**Clinical Equality Impact Assessment Toolkit**

**INITIAL SCREENING**

**Scope**

NB Although the term ‘policy’ is used throughout this document, this is purely for the purpose of simplicity. The Statutory Codes that support the Equality Duties relating to race, disability and gender, require us to also carry out an Equality Impact Assessment for -

- Policies;
- Documents;
- decisions;
- practices;
- procedures (e.g. MPDs, SOPs and guidance);
- projects;
- proposals; and
- strategies.

Name of policy/Doc	Code or reference, if any
<b>Additional Supporting Documents e.g. FRM/DAT</b>	
Name of policy/Doc	Code or reference, if any

**What has triggered the EIA at this time?**

	Please tick applicable trigger
Periodic review of evaluation of an existing policy	<input type="checkbox"/>
Change to an existing policy	<input type="checkbox"/>
Development of a new policy	<input type="checkbox"/>

### Who are the relevant people?

	NAME	DIRECTORATE	FUNCTION	JOB TITLE
EIA requested by				
Policy owner				
Policy author (if different)				
EIA to be carried out by				

### Step 1 – Outlining the policy

1.1	What is the main purpose of the policy?	
1.2	If it is a change to an existing policy, what is the nature and purpose of the change?	
1.3	What are the main activities relating to the policy?	
1.4	Who are, or will be, the main stakeholders in the policy?	

### Step 2 – Assessing the policy’s relevance to our statutory duties

2.1	Does, or could any aspect of the policy affect our duty to do the following:	Yes X	No X
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a)	• Promote equality of opportunity?	<input type="checkbox"/>	<input type="checkbox"/>
b)	• Eliminate discrimination?	<input type="checkbox"/>	<input type="checkbox"/>
c)	• Eliminate harassment?	<input type="checkbox"/>	<input type="checkbox"/>
d)	• Promote good community relations?	<input type="checkbox"/>	<input type="checkbox"/>
e)	• Promote positive attitudes towards disabled people?	<input type="checkbox"/>	<input type="checkbox"/>
f)	• Encourage participation by disabled people?	<input type="checkbox"/>	<input type="checkbox"/>
g)	• Consider more favourable treatment of disabled people?	<input type="checkbox"/>	<input type="checkbox"/>

### Step 3 – Considering where there is, or might be, any impact on equality

3.1	<p>Do you have any evidence that:</p> <ul style="list-style-type: none"> <li>• any aspect of the policy or</li> <li>• the way that it is delivered or accessed</li> </ul> <p>Does, or could, have an <b>impact on groups of people</b> (potential or existing employees, donors, patients, employees of the wider NHS, customers etc.)?</p> <p>(NB evidence could include NHSBT data from HR, Employee Services, Pulse etc. or wider demographic data and other statistics, including census findings, population estimates, the results of previous research or consultations including quantitative and qualitative data, recommendations or reports by representative groups and so on)</p>			
	<i>Group – Please tick</i>	<i>Positive impact – policy does (or could) benefit, or improve equality for:</i>	<i>Negative impact – policy does (or could) disadvantage or exclude:</i>	<i>The evidence suggests there is no difference in impact between different groups</i>
		X	X	X
a)	Men	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	Women	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c)	Trans people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d)	Asian or Asian British people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e)	Black or Black British people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f)	Chinese people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

g)	People of mixed race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h)	White or White British people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i)	People of any other ethnicity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j)	Disabled people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k)	Lesbians, gay men or bisexuals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l)	Particular age groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m)	Particular faith groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
n)	Carers/Part Time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3.2	Is there any evidence that the policy does, or could, affect relations between people from different racial groups?	Yes X	No X
		<input type="checkbox"/>	<input type="checkbox"/>

**3.3 If you do not have sufficient evidence to complete Step 3.1 above, please contact the National Equality and Diversity team in the first instance on 07525299111 or fnt 377 9111.**

**Is an EIA required?**

**YES, if:**

- You have identified existing, or potential:

- effects on any of our statutory duties, answering any 'Yes' in step 2.1;
- positive or negative impacts, ticking either the 'positive' or 'negative' columns in step 3.1; or
- affect on relations between people from different racial groups, answering 'Yes' in step 3.2
- If you have answered yes to either step 2.1; 3.1 or 3.2 and it is not within your directorates remit to conduct the EIA, please make this clear in the summary box below.

Then you should carry out a Full EIA.

**NO, if:**

- You have answered 'No' to all parts of section 2.1 and 3.2 and ticked the 'no difference in impact' column in step 3.1,

Then an EIA is not required and you should:  
a) give brief reasons for your decision in the box below:  
b) complete and sign the Sign Off Certificate.

Summary of reasons for no EIA.

**NB**

It is recommended that the 'low' priority policies and those deemed not relevant to the equality duty is impact assessed every three years. The Initial Assessment and Sign Off: Initial screening certificate will also need to be completed.

## Sign-off: Initial Screening certificate

(Do not sign if full EIA is required)

Name of policy/Doc	Policy code or reference, if any

**Step 1** - complete the section immediately below (**step 1 only**) and send an online copy to the National Equality and Diversity team [marcia.wolfe@nhsbt.nhs.uk](mailto:marcia.wolfe@nhsbt.nhs.uk)

<b>The policy has a significant impact upon equality issues but is governed by The UK Donor Selection Guidelines. The Guidelines are mandatory and necessary to maintain patient and donor Safety. Therefore this policy does not require a full EIA.</b>	
Name of Assessor	Job title
Function area/ Directorate	Date of initial screening completed

**Step 2** – send preceding pages including the certificate to the National Equality and Diversity (E and D) team

Quality check: screening document has been checked by EIA coordinator:		
Name:	Date:	Signature:

**Step 3** – National E and D team send to appropriate Senior Management Team (SMT) member for completion of the section below

Authorised by ( <i>Senior Management Team</i> )	
Date of Authorisation	
Date for next review	

**Step 4** – SMT to send completed and signed copy of the certificate only to the National Equality and Diversity team [marcia.wolfe@nhsbt.nhs.uk](mailto:marcia.wolfe@nhsbt.nhs.uk)

### Next steps

You should always:  
EIA Toolkit – version Clinical April 2009.  
Review Date. Dec 2009

- keep a copy of the completed Sign Off: Initial screening certificate, together with the Initial Screening pages. It is recommended that this is kept wherever the policy is stored.
- Make arrangements to monitor the policy and review the initial screening in line with NHSBT EIA guidance.

# FULL IMPACT ASSESSMENT

## Step 4 – Reviewing the data and other evidence

### 4.1 Scoping the equality impact assessment (EIA)

Building on the material included at the screening stage, you should begin the EIA by determining its scope. The EIA should consider the existing or likely impact on equality of the policy in relation to our employees and external service users. The EIA should be proportionate to the significance and coverage of the policy.

#### What are the main issues you need to consider?

Some things to consider:

- Are there any examples of existing good practice in this area that can be built on– such as measures to improve access to the policy among particular groups?
- You may wish to consider how the policy will be delivered or communicated

### 4.2 Existing data collection and evidence

#### What data, research and other evidence or information is available which are relevant to this EIA?

Please cite any quantitative (for example, statistical or research) and qualitative evidence (for example, monitoring data, complaints, surveys, focus groups, questionnaires, meetings, interviews) relating to groups having different needs, experiences or attitudes in relation to this policy. Describe briefly what evidence you have used.

**Please Select...**

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**FULL IMPACT ASSESSMENT**

4.3 Relevant previous consultation or involvement

<b>Please use the table below to outline any previous involvement or consultation which is relevant to this policy.</b>	
<i>Diversity strand</i>	<i>Briefly describe what was done, with whom, when and where. Please provide a brief summary of the responses gained and links to relevant documents, as well as any actions.</i>
Age	
Disability	
Gender	
Race	
Religion or belief	
Sexual orientation	
Trans people	
Carers/Part time	

4.4 Summary of the existing or likely impact on different groups of people

<b>What does the data, research and other evidence tell you about different groups of people’s experiences of the policy or any of the main activities associated with it?</b>	
<i>Diversity strand</i>	<i>Summary of the existing or likely impact</i>
Age	
Disability	
Gender	
Race	

Religion or belief	
Sexual orientation	
Trans people	
Carers/Part time	

#### 4.5 Gaps in data, research or evidence

What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the policy? Who (experts/relevant groups) could help you gain further evidence or views on the issues by way of commissioning new data or research?

**NB please contact the National Equality and Diversity team before commissioning any new data or research**

### Step 5 – Involving and consulting the right people

When considering how you will involve and consult other people in developing, reviewing or changing the policy, you need to think about internal and external audiences and stakeholders. **NB please contact the National Equality and Diversity team for details of internal consultation groups.**

#### 5.1 Identification of consultation/involvement participants

Who are the people who are (or are likely to be) affected by the policy that need to be consulted and involved in identifying:

- the nature of any positive or negative impact
- any barriers to participation in, or ability to benefit from, a policy
- potential solutions to those negative impacts
- opportunities to improve or proactively promote equality of opportunity etc?

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5.2 Consultation/involvement planning

<b>Please use the table directly below to outline any planned consultation on, or involvement with, this policy area that needs to take place with groups/individuals from equality groups. Consider NHSBT employees and external stakeholders as appropriate.</b>	
<i>Groups of people</i>	<i>Summary of planned consultation/involvement (NB consider 'what', 'who', 'how', and 'when')</i>
Women/Men/Trans people	<b>Please Select...</b>
People from any particular ethnic group	<b>Please Select...</b>
Disabled people	<b>Please Select...</b>
Lesbians, gay men, or bisexual	<b>Please Select...</b>
People from a particular age group	<b>Please Select...</b>
People of a particular religion or belief	<b>Please Select...</b>
Carers/ Part time	<b>Please Select...</b>

Complete Step 6 once the consultation, research or involvement has been carried out.

It is recommended that the consultation used is no more than two years old.

## Step 6 – Reviewing your findings and assessing the policy’s impact

When considering your findings and impact, it is important to do so in the context of **our statutory duties** (in Step 2.1 – repeated below for ease of reference) to:

- Promote equality of opportunity (e.g. between men and women);
- Eliminate discrimination;
- Eliminate harassment;
- Promote good community relations;
- Promote positive attitudes towards disabled people;
- Encourage participation by disabled people; or
- Consider more favourable treatment of disabled people.

### 6.1 Results of research, consultation or involvement of others

NB remember to also consider how the policy does or will affect:

- People across multiple diversity strands (e.g. Asian men, disabled women etc.)
- Good relations and wider community cohesion

**Please use the table directly below to outline the summary findings from the consultation/involving activities carried out with NHSBT employees and external stakeholders as appropriate.**

<i>Groups of people</i>	<i>Summary of findings</i>	<i>Nature of any impact (positive or negative)</i>
Women/Men/Trans people		
People from any particular ethnic group		

Disabled people		
Lesbians, gay men, or bisexual		
People from a particular age group		
People of a particular religion or belief		
Carers/Part time		

## 6.2 Assessing the impact

6.2	As a result of everything you've done so far (e.g. review of evidence, outcomes of any consultation or research etc.), do your findings indicate that <b>there is a need to take action</b> to either:	Yes X	No X
a)	<ul style="list-style-type: none"> <li>Reduce or eliminate any adverse or negative impact that you have found for any group of people?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
b)	<ul style="list-style-type: none"> <li>Address existing patterns of discrimination, harassment or disproportionally?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>
c)	<ul style="list-style-type: none"> <li>Use the policy to further promote equality of opportunity?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>

If YES to any – please consider the options in 7.1 below and then complete section 7.2

If NO to all - please give **brief** reasons for your answer in box 6.3, then go to Step 8.

6.3	
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**NB** Contact the E & D team before going any further, if you are unsure whether or not any:

- **adverse or negative impact** you have identified amounts to unlawful discrimination,
- any apparently discriminatory, but **deliberate positive impact** for a particular group of people, may amount to lawful positive action

## Step 7 – Making a decision

7.1 The choices of action available to you in respect of any ‘Yes’ responses above

OPTION	CONSIDERATIONS	X
i) Put measures in place	What measures could you put in place, or actions could you take, to reduce or remove any adverse impact, address any disproportionally or help promote equality of opportunity?	<input type="checkbox"/>
ii) Change the policy	What changes could you make to policy, or the way it is/will be implemented, to remove any adverse or negative impact or to better promote equality of opportunity?	<input type="checkbox"/>
iii) Use alternative policies	What alternative policies or practices could you use to achieve the policy aims that avoid any adverse or negative impact?	<input type="checkbox"/>
iv) Abandon the policy altogether	Is it an option not to implement the policy or to abandon it altogether? If not, why not?	<input type="checkbox"/>
v) Rely on a ‘justification’ defence	How will you justify any adverse or negative impact? (NB seek guidance from the E & D team)	<input type="checkbox"/>

Further information is provided in the EIA guidance document, but some things to think about are:

- Positive measures designed to address disadvantage and reach different communities or groups;
- Changes in communication methods, providing language support, collecting data, revising programmes or involvement activities; and
- Actions that would enable disabled people to be treated more favourably where necessary?

7.2 Recommendations for action

Please outline below (adding more rows as required) your recommendations for action to address any issues you have identified in either:

- considering the impact on equality in sections 3.1 or 3.2
- analysing the existing data, evidence or research in section 4.4 or
- reviewing the outcome of any consultation or involvement activity in section 6.1

<b><i>Issue to be addressed – in brief</i></b>	<b><i>Recommended action by the individual completing the EIA</i></b>	<b><i>Decision by the individual accountable for the policy</i></b>

Please note the agreed actions should be reflected in the action plan (see Step 10)

## Step 8 - Strengthening the policy

### 8.1 Improving take-up and understanding of the policy

#### **What will be done to improve access to, and take-up of, services or understanding of the policy?**

Some things to consider:

- Increasing awareness of the policy among staff;
- Reviewing your method of delivering or communicating the policy to make sure you reach all parts of local communities;
- Encouraging wider public involvement in our work or communications activities; or
- Encourage different groups, including disabled people, to get involved in what we do.

Please note that you may need to revisit this section once you have completed the policy development or review process.

## Step 9 – Monitoring, evaluating and reviewing

### 9.1 Wider and strategic planning

#### **How will the recommendations of this assessment be built into the wider planning and review processes?**

- This may include policy reviews, development of annual or strategic plans and use of performance management systems.

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9.2 Reviewing the policy and any improvement measures taken

**How will you monitor the impact and effectiveness of any changes to an existing policy, or any new policy, to ensure that it does not discriminate against any group of people?**

This could include:

- adaptations or extensions to current monitoring systems, relevant timeframes;
- a commitment to carry out an EIA review once the policy has been in place for one year; or
- a short-term review to evaluate the extent of any improvement for access to, or benefit from, an existing policy or practice by NHSBT employees or service users as appropriate.

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## Step 10 – Setting out a timetable for action

**Name of Policy:**

**Policy Code/Number (if appropriate)**

Taking into consideration the responses outlined in Steps 1-9 above, complete the action plan below.			
	What (specific actions)	When (target date)	Who (individual responsible)
Involvement and consultation			
Data collection and evidence			
New measures or actions in respect of the policy			
Changes to policy/practice			
Monitoring, evaluating and reviewing			

## Sign-off: Full EIA Certificate

<b>Name of policy</b>	<b>Policy code or reference, if any</b>

Step 1 – the relevant people complete the two sections immediately below

<b>Individual responsible for EIA completion</b>			
I have fully assessed this policy in relation to its actual or potential effects on equality.			
Name:	Job title and Directorate:	Date:	Signature:

<b>Individual accountable for the policy</b>			
I take responsibility for the decisions made (section 7.2), and agree with the actions outlined (Step 10), to address the issues arising from the equality impact assessment of this policy			
Name:	Job title and Directorate:	Date:	Signature:

Step 2 – all pages (Full EIA) to the National Equality and Diversity team

<b>EIA Team</b>		
I have quality assurance checked this Equality Impact Assessment		
Name:	Date:	Signature:

Step 3 - National Equality and Diversity team send to appropriate Executive Team member for completion of the section below

<b>Executive Team level or Nominated Person (sign-off)</b>			
I am satisfied that this is a complete, rigorous & robust assessment of the impact of this policy.			
Name:	Job title and Directorate:	Date:	Signature:

Step 4 – Executive Team member to send an online copy of completed document to the National Equality and Diversity team [marcia.wolfe@nhsbt.nhs.uk](mailto:marcia.wolfe@nhsbt.nhs.uk)

It is recommended that this is kept wherever the policy is stored.

Make arrangements to monitor the policy and review the initial screening in line with NHSBT EIA guidance.