



South Gloucestershire Clinical Commissioning Group

EQUALITY IMPACT ASSESSMENT

NAME OF SERVICE/POLICY/STRATEGY BEING ASSESSED:

Code of Business Conduct Policy

DETAILS OF LEAD COMMISSIONER OR CSU STAFF COMPLETING THIS SCREENING:

Name	Lucy Jones
Title	Corporate Support Officer
Dept/Service	Quality and Governance
Telephone	0117 947 4426
E-mail	lucy.jones@southgloucestershireccg.nhs.uk

APPROVED AND SIGNED BY RELEVANT DIRECTOR:

Name	Anne Morris
Title	Director of Nursing / Head of Safeguarding
Date	April 2015

N.B.

1. Once this Equality Impact Assessment has been approved and signed off, an electronic copy will need to be sent to the CCG's Equalities and Patient and Public Involvement Officer for publication on the CCG website.
2. Please read the background to the EqIA at the back of this document prior to starting.

1. PLEASE GIVE A BRIEF DESCRIPTION OF THE SERVICE/POLICY/STRATEGY AND ITS AIMS/OBJECTIVES:

As set out in section 8 of NHS South Gloucestershire Clinical Commissioning Group's (CCG) constitution, employees, members, committee and sub-committee members and Governing Body Members must comply with the CCG's policy on business conduct and its associated policies including the CCG's Anti-Fraud and Bribery policy and the Whistleblowing Policy.

The aim of the policy is to inform employees and members of the CCG of how to avoid actual conflicts of interest and enable them to make any declarations in advance of a problem occurring.

2. IS THIS SERVICE/POLICY ...

New <input type="checkbox"/>	Existing <input checked="" type="checkbox"/>	Refreshed <input type="checkbox"/>
-------------------------------------	---	---

3. WHO IS THIS SERVICE/POLICY/STRATEGY LIKELY TO HAVE AN IMPACT ON?

Patients <input type="checkbox"/>	Carers <input type="checkbox"/>	Visitors <input type="checkbox"/>	Staff <input checked="" type="checkbox"/>
Other <input type="checkbox"/> [Please state who]			

4. WHAT EVIDENCE ARE YOU USING TO INFORM THIS ASSESSMENT?

SOURCE	<input checked="" type="checkbox"/>	Date	Details of Evidence [hyperlink to documents]
Demographic (including Census) data	<input type="checkbox"/>		
Research Findings	<input type="checkbox"/>		




SOURCE	<input checked="" type="checkbox"/>	Date	Details of Evidence [hyperlink to documents]
Recent Consultations and Surveys	<input type="checkbox"/>		
Results of: ethnic monitoring data; and any equalities data from the local authority / joint services; or Health inequality data	<input type="checkbox"/>		
Anecdotal information from groups and agencies within South Gloucestershire	<input type="checkbox"/>		
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>		
Analysis of PALS, complaints and public enquires information	<input type="checkbox"/>		
Analysis of audit reports and reviews	<input type="checkbox"/>		
Other:	<input type="checkbox"/>		
None:	X	April 2015	

5. ASSESSMENT OF THE EFFECTS OF THE SERVICE/POLICY/STRATEGY ON THE PROTECTED CHARACTERISTICS [EQUALITY GROUPS]

Assess whether the Service/Policy has a positive, negative or neutral impact on the Protected Characteristics.

- **Positive impact** means promoting equal opportunities or improving relations within equality groups
- **Negative impact** means that an equality group(s) could be disadvantaged or discriminated against
- **Neutral impact** means that it has no effect currently on equality groups

Please answer Yes or No in the following table and provide reasons accordingly:

Assessment of Impact of Policy/Service on Protected Characteristics [Equality Groups]				
Protected Characteristic	Positive Impact 	Negative Impact 	Neutral Impact 	Please provide reasons for your answer and any mitigation required
Age [Children and Young people 0 to 19; Older People 60+]			X	This policy has no age specific criteria within it.
Disability Physical Impairment; Sensory Impairment; Mental Health; Learning Difficulty; Long-Term Condition			X	This policy has no disability specific criteria within it. It can be made available in different formats to staff members of members of the public on request.
Gender Reassignment [Trans people]			X	This policy has no gender specific criteria within it.
Race			X	This policy has race specific criteria within it.
Religion or Belief			X	This policy has no Religion or belief specific criteria within it.
Sex [Male or Female]			X	This policy has no gender specific criteria within it.

Assessment of Impact of Policy/Service on Protected Characteristics [Equality Groups]				
Protected Characteristic	Positive Impact ✓	Negative Impact ✗	Neutral Impact ✓	Please provide reasons for your answer and any mitigation required
Sexual Orientation			X	This policy has no sexual orientation criteria within it.

- **Positive impact** means promoting equal opportunities or improving relations within equality groups
- **Negative impact** means that an equality group(s) could be disadvantaged or discriminated against
- **Neutral impact** means that it has no effect currently on equality groups

6. IS THE SERVICE/POLICY/STRATEGY COMMISSIONED, PROCURED DESIGNED AND DELIVERED TO MEET THE HEALTH NEEDS OF THE DIFFERENT PROTECTED CHARACTERISTICS [EQUALITY GROUPS]

PROTECTED CHARACTERISTIC	PLEASE STATE HOW
Age [Children and Young people 0 to 19; Older People 60+]	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies
Disability Physical Impairment; Sensory Impairment; Mental Health; Learning Difficulty; Long-Term Condition	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.
Gender Reassignment [Trans people]	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.

PROTECTED CHARACTERISTIC	PLEASE STATE HOW
Race including nationality and ethnic origin	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.
Religion or Belief	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.
Sex [Male or Female]	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.
Sexual Orientation	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.
Marriage and civil partnership	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.
Pregnancy and maternity	N/A – this policy is an internal document designed to help staff understand how to manage conflicts of interest in line with anti-fraud and Bribery guidance and the CCG’s Constitution, Standing Orders and Detailed Financial Policies.

7. HOW DOES YOUR SERVICE/POLICY/STRATEGY ENSURE THAT INDIVIDUAL PEOPLE'S HEALTH NEEDS ARE ASSESSED AND MET IN APPROPRIATE AND EFFECTIVE WAYS ACROSS ALL PROTECTED CHARACTERISTICS/EQUALITY GROUPS ?

[EDS REF: 1.2]

N/A as this is not a health needs policy. It is a guidance document for staff, Governing Body members, Subcommittee Members and Members of Commissioning Organisations i.e. GP Practices.

8. HOW DOES YOUR SERVICE/POLICY/STRATEGY ENSURE THAT FOR ALL EQUALITY GROUPS, THE TRANSITIONS FROM ONE SERVICE TO ANOTHER, FOR PEOPLE ON CARE PATHWAYS, ARE MADE SMOOTHLY WITH EVERYONE WELL-INFORMED?

[EDS REF: 1.3]

N/A as this is not a health needs policy. It is a guidance document for staff, Governing Body members, Subcommittee Members and Members of Commissioning Organisations i.e. GP Practices.

9. HOW DOES YOUR SERVICE/POLICY/STRATEGY ENSURE THAT WHEN PEOPLE FROM ALL EQUALITY GROUPS USE NHS SERVICES THEIR SAFETY IS PRIORITISED AND THEY ARE FREE FROM MISTAKES, MISTREATMENT AND ABUSE?

[EDS REF: 1.4]

N/A as this is not a health needs policy. It is a guidance document for staff, Governing Body members, Subcommittee Members and Members of Commissioning Organisations i.e. GP Practices.

10. HOW DOES YOUR SERVICE/POLICY/STRATEGY ENSURE THAT PEOPLE, CARERS AND ALL COMMUNITIES CAN READILY ACCESS HOSPITAL, COMMUNITY HEALTH OR PRIMARY CARE SERVICES AND ENSURE THAT THEY ARE DENIED ACCESS ON UNREASONABLE GROUNDS?

[EDS REF: 2.1]

Not applicable as this is not a health needs policy. It is a guidance document for staff, Governing Body members, Sub Committee Members and Members of Commissioning Organisations i.e. GP Practices.

11. HOW DOES YOUR SERVICE/POLICY/STRATEGY ENSURE THAT PEOPLE FROM ALL EQUALITY GROUPS ARE INFORMED AND SUPPORTED TO BE AS INVOLVED AS THEY WISH TO BE IN DECISIONS ABOUT THEIR CARE?

[EDS REF: 2.2]

N/A as this is not a health needs policy. It is a guidance document for staff, Governing Body members, Sub Committee Members and Members of Commissioning Organisations i.e. GP Practices.

12. HOW DOES YOUR SERVICE/POLICY/STRATEGY ENSURE THAT PEOPLE FROM ALL EQUALITY GROUPS REPORT POSITIVE EXPERIENCES OF THE NHS?

[EDS REF: 2.3]

This policy ensures that all employees, governing body members, subcommittee members and members of commissioning organisations are aware of the policy in place and the requirements upon them to adhere to this. It also ensures that the CCG remains open and transparent in the eyes of the public, particularly in handling and managing conflicts of interests and ensuring an openness when commissioning from GP practices.

13. HOW DOES YOUR SERVICE/POLICY/STRATEGY ENSURE THAT COMPLAINTS FROM PEOPLE FROM ALL EQUALITY GROUPS ARE HANDLED RESPECTFULLY AND EFFICIENTLY?

[EDS REF: 2.4]

All complaints are handled in line with the CCG's Management of Compliments, PALS enquiries and Complaints policy and therefore in line with the NHS Complaint Regulations 2009. These regulations, and thus the CCG Policy do not discriminate against any of the protected groups.

14. HAVE YOU SET UP OR ARRANGED FOR ANY OF THE FOLLOWING:

Attribute	Yes	No	If Yes, please describe what these are, If No, please give reasons.
Equality Monitoring Systems		X	
Equality Related Performance Indicators		X	

15. PLEASE EXPLAIN HOW THE RESULTS OF THIS SCREENING EXERCISE WILL INFLUENCE YOUR SERVICE/POLICY/STRATEGY:

This screening exercise has established that the implementation of a CCG BYOD policy has the greatest impact on staff, and how they use personal devices for work purposes.

This assessment has identified;

- That there is no specific inequality attributable to any of the equality groups through the implementation of this policy, and
- the need for staff training on the actual and potential security scenarios to be mitigated against, outside of any technical security process and/or implementation.

16. ACTION PLAN

None required.

17. DATE EQIA COMPLETED: 7TH APRIL 2015

18. REVIEW DATE: APRIL 2017