

SOUTH GLOUCESTERSHIRE ADULT COMMUNITY HEALTH SERVICES
FOR
PEOPLE WITH LEARNING DIFFICULTIES
PROCUREMENT OCTOBER 2013 TO OCTOBER 2018
EQUALITY IMPACT ASSESSMENT

1. PURPOSE

This equality impact assessment [EIA] sets out to ensure that the service to be commissioned does not discriminate against or disadvantage any adult with learning difficulties irrespective of their protected characteristic as defined in the Equality Act 2010.

The protected characteristics under the Equality Act (2010) are: Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; Sexual Orientation

This EIA will also examine how the service to be commissioned meets the three general aims of the Public Sector Equality Duty requirements of the Equality Act 2010 which are to:

- **Eliminate** discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act;
- **Advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it;
- **Foster** good relations between people who share a relevant protected characteristic and those who do not share it.

2. PREPARATION OF THIS EIA

This EIA has been prepared by Trevor Eardley (consultant employed on the procurement project); Nigel Roderick (Equalities and Patient and Public Involvement Officer) and Kathryn Hudson (Head of Partnerships & Joint Commissioning).

3. BACKGROUND AND CONTEXT

Under the Health and Social care Act 2012, NHS South Gloucestershire Clinical Commissioning Group [CCG] is responsible for commissioning a range of services for people with learning difficulties in South Gloucestershire. The CCG in its shadow form has worked with NHS South Gloucestershire in the commissioning and procurement processes leading up to April 2013 when the CCG was formally established. This is particularly important as the contract is planned to commence in October 2013.

One of the key challenges is defining the boundary between a specialist service and general healthcare services that people with learning difficulties

can access as any other citizen. Following consultation and engagement with users, the CCG intends to commission a single provider to supply this service.

The commissioning of the service is predicated on the social model of disability which makes an important distinction between the terms “impairment” and “disability”. The social model is a concept which recognises that some individuals have physical or psychological differences which can affect their ability to function in society. However the social model suggests it is society that causes the individual to be disabled. In other words individuals with impairments are not disabled by their impairments but by the barriers that exist in society which do not take into account their needs.

Local South Gloucestershire Data:

Department of Health, Valuing People, (2001) estimated that there are roughly 1.4 million people with learning difficulties in England. This figure comprised of approximately 1.2 million people with a mild or moderate learning difficulties and 210,000 with a severe or profound learning difficulties. Of these there are 224,000 people in England with learning difficulties known to social services.

These figures mean that a family doctor with a list of 2,000 patients will have about six patients with severe learning difficulties and about 44 people with mild-moderate learning difficulties, although the rate will vary widely between practices. It is estimated that the population of people with learning difficulties will rise over the next 10 years, at about 1% per annum. The prevalence of learning difficulties is higher in communities of South Asian ethnic background, and an increase in young adults from these communities is also expected.

The numbers of people with a learning difficulties living in South Gloucestershire are estimated as follows:

- A total adult learning difficulties population of 5028 of which 4101 are estimated to be aged between 18-64 years;
- 1048 people aged 18 and over predicted to have a moderate or severe learning disability;
- 246 people aged 18-64 predicted to have a severe learning disability;
- 929 people known to statutory agencies;
- 327 people in care homes, of which 20 are in care homes with nursing.
- (Source: Projecting Older People Population Information / Projecting Adult Needs and Service Information 2011).
- In any one year in South Gloucestershire, there are less than 5 people with learning difficulties and complex, challenging needs who require admission to an assessment and treatment hospital, or a low, medium or high secure hospital.

Within South Gloucestershire the number of people with learning difficulties known to social services during 2011/2012 is as follows:

Age Group	Number
Age 18 – 64	773
Age 65+	175
Male	542
Female	406

Within South Gloucestershire in 2010 -2011 (source: Improving Health & Lives: Learning Difficulties Observatory; www.ihal.org.uk/profiles):

- 854 adults with learning difficulties were known to GPs
- 615 adults with learning difficulties (85.7%) received a GP annual health check (England average 48.64%)
- 720 adults (18 to 64) with learning difficulties known to local authorities
- Median age at death for people with learning difficulties in South Gloucestershire is 59 years (England median age is 55)
- Nationally, the proportion of admissions to general hospitals which happen as emergencies is substantially larger for people with learning difficulties than for people who do not have learning difficulties (50.0% vs 31.1%; in South Gloucestershire the proportion in 2008-2009 was 50.07%)

4. WHAT IS TO BE COMMISSIONED

The CCG aims to commission a new community based Specialist Adult Health Learning Difficulties Service that integrates the current community services through a single provider. This would bring together the community services that are currently provided from Bristol Community Health and the NHS Avon & Wiltshire Mental Health Partnership Trust. These services include:

- Intensive Community Support Team
- Community Learning Difficulties Nurses
- Community Psychology and Psychiatry
- Hospital and Primary Care Liaison Nurses
- Physiotherapists, Occupational Therapists and Speech and Language Therapists
- Art Therapy, Dietetics

The plan is to establish a new service to support people with learning difficulties to gain better access to mainstream health services and, together with colleagues in the local authority, be as independent as possible within the local community. At the heart of this service will be a Learning Difficulties Health Hub comprising of a multi-disciplinary specialist team. The new service will retain many of the elements of the existing service but with the specialist core team providing a single point of access.

There will only be direct support provided where these needs cannot be met by 'reasonable adjustment' in mainstream healthcare settings. There are three elements which do not form part of this service:

- Assessment and treatment services
- Forensic services
- Access to mainstream Mental health services both in crisis and long term

The Learning Difficulties Health Hub will be required to case manage all referrals to the above services and proactively monitor service quality and outcomes for individuals and report quarterly to the commissioners.

5. GUIDING PRINCIPLES

The specification for the new service is founded on the four guiding principles set out in Valuing People Now which apply to both individuals and services:

- **Rights:** People with learning difficulties and their families have the same human rights as everyone else.
- **Independent living:** This does not mean living on your own or having to do everything yourself. All disabled people should have greater choice and control over the support they need to go about their daily lives; greater access to health, housing, education, employment, leisure and transport opportunities and to participation in family and community life.
- **Control:** This is about being involved in and in control of decisions made about your life. This is not necessarily doing exactly what you want, but is about having information and support to understand the different options and their implications and consequences, so people can make informed decisions about their own lives.
- **Inclusion:** This means being able to participate in all the aspects of community – to work, learn, get about, meet people, be part of social networks and access goods and services – and to have the support to do so.

6. CONSULTATION AND ENGAGEMENT WITH SERVICE USERS

6.1 Enhanced Quality Assurance of Services to People with Learning Difficulties

Following the horrific events at Winterbourne View, NHS South Gloucestershire and the shadow CCG worked with other commissioners to develop an Enhanced Quality Assurance Framework to build upon the work of the Care Quality Commission to ensure that all services commissioned for people with learning difficulties are subject to a high level of scrutiny.

Over the period April 2011 to March 2012, the South Gloucestershire's Learning Difficulty Partnership Board [LDPB] Co-chairperson, who has learning difficulties, and a family carer of a person with learning difficulties have been working with the CCG and South Gloucestershire Council to

develop and implement a quality assurance system which includes people with learning difficulties and carers in the testing of services.

As part of this work, the LDPB co-chairperson prepared a questionnaire that has been used to ask providers how they make their services person-centred. It also asked about the service users' right to visitors and their knowledge about how to complain if they were not happy with the service they received.

The questionnaire is now included as part of the quality assurance process and all new service providers are expected to complete the questionnaire before a service is commissioned. The Co-Chair also visited the existing specialist services with the NHS Commissioner to provide an assessment of the overall quality of these services.

The questionnaire has since been incorporated in the procurement process to inform the quality criteria for assessment of potential bidders for the new South Gloucestershire Adult Community Health Learning Difficulties Service.

6.2 User Views from the South Gloucestershire Community Learning Difficulty Service Procurement

The views and experiences of people with learning difficulties, and carers of people with learning difficulties, have been sought to help shape the future of these services. This has involved the following:

- The feed back received from the involvement described above has been used to inform the development of the draft service specification;
- A meeting was held with carers to explore what worked well with current services, and how services could be improved in the future. The feedback was used to inform the draft Service Specification;
- A meeting was held in August 2012 with people with learning difficulties, carers, and other stakeholders to share the draft service specification and to help finalise the detail.
- The co-chairperson of the South Gloucestershire Learning Difficulty Partnership Board, who has learning difficulties, supported NHS South Gloucestershire and the shadow CCG to select the new provider as a lay volunteer by being part of the evaluation team.
- A carer and representative of People First was also a member of the procurement evaluation team
- Feedback was also received from people who use the services and family carers following a number of health action days.

During the process to develop and shape the service specification there were some key issues that people wanted to include in new service:

- People had good experience of the hospital liaison nursing service that is in place within South Gloucestershire to ensure access for people with learning difficulties to mainstream acute health services from North Bristol NHS Trust and wanted to see more of this type of support reflected across all health services.
- There was concern to ensure that people with learning difficulties are safe when in receipt of health services and can be assured of quality health services when they need them.

- People wanted to ensure that there was a single point of contact for all people with learning difficulties and their families and carers to offer advice and support for their health needs.
- People wanted 24 hour access to support.
- People wanted to see health care professionals either at home or as close to their own as possible in a community setting.

7. ASSESSMENT

7.1 Methodology

The impact of the procurement was assessed and rated using the following classifications:-

- **Positive impact** meaning that the procurement project will promote equal opportunities or improve relations within equality groups
- **Negative impact** meaning that the equality group could be disadvantaged or discriminated against as a result of the procurement
- **Neutral impact** meaning that the procurement project will have no effect currently on equality groups

7.2 Service Specification and Procurement Process

The service specification has been developed based on the consultation and engagement with service users – see 6.2 above. Additionally, the service specification includes a number of clauses to ensure that a potential provider complies with the requirements of the Equality Act 2010. The following is an extract of some of the relevant clauses included in the Service Specification [Final Version January 2013]:

- Clause 8.1 - NHS South Gloucestershire has a strategic priority to improve the health of people in South Gloucestershire. The Vision is that people with learning difficulties will be treated with dignity and respect and have the same life opportunities as everyone else.
- Clause 9.8 - All Information for service users will be provided in an appropriately accessible format and include information in alternative languages, timely access to interpretation services and support for people with sensory loss.
- Clause 9.9 - The service will aim to accommodate the flexible needs of service users and their families. Core hours are 8.30am to 5.00pm Monday to Friday with robust arrangements in place for out of hours contact, including liaison with mental health services and comprehensive handover of referrals to The Learning Difficulties Health Hub.
- Clause 10.3 - The aim of the service is to enable all adults with learning difficulties to be safe, to lead as full a life as possible and reach their full potential. This includes:
 - To provide an equitable and accessible service for all people with learning difficulties (including those in a transitional stage) providing better co-ordinated access to primary medical, community and specialist services, including palliative care.

- To provide a range of support and 'reasonable adjustments' to mainstream services for people with long-term conditions to ensure that people with learning difficulties receive the same outcomes from the provision of long-term care services as the rest of the population
- Clause 10.4 - This specification for the commissioning of specialist learning difficulties services and appendices emphasises that services should aim for the following outcomes:
 - The provider must ensure that all staff understand and operate within the legal context in which these services are provided. This includes:
 - The NHS and Community Care Act 1990
 - The Health and Social Care Act 2012
 - The Mental Capacity Act 2005 and consequent Deprivation of Liberty Safeguards
 - The Mental Health Act 1983 and 2007
 - **The Equality Act 2010**
- Clause 11.1 - Outlined below are details of each element of the new service and how these should be developed over the lifetime of the contract. The service must be based on the following core values:
 - Services which are accessible and inclusive to all, including those individuals presenting the greatest degree of challenge. Ensuring fair access for all and that the service reflects the needs of people with protected characteristics as defined in the Equality Act and other seldom heard groups.
- Clause 13.5 - The service provider will operate in line with the Equality Act 2010 and the Human Rights Act 1984 and be able to demonstrate that it does so. The service provider should ensure that services are monitored to ensure they are accessible to all members of the community and provide equity of access for all South Gloucestershire residents.

The procurement process required potential bidders in the PQQ to indicate basic compliance with Equality issues including statutory obligations, and a formal Equality and Diversity Policy. The Equalities and Human Rights section of the PQQ evaluation held 10% of the weighting of the total evaluation scores. The ITT stage submissions required a greater level of equalities evidence that was further questioned at the Interview stage with short-listed bidders. The Evaluation included scoring and weighting of equalities evidence.

7.3 Impact on Protected Characteristics [Groups]

7.3.1 Age Specific

The following legislation underpins the decision to develop specialist services for adults with learning difficulties.

Over the years the development of specific legislation has differentiated between services for children and adults. This legalisation includes:

- National Assistance Act 1948 – defined local authority responsibilities in support people in terms of age, illness, disability or any other circumstances are in need of care and attention which is not otherwise available to them.
- Chronically Sick and Disabled Persons Act 1970 local authorities were given a duty to assess the individual needs of everyone who fell within section 29 of the National Assistance Act – to qualify for services under this section individuals must be ‘aged 18 or over who are blind, deaf, or dumb, or who suffer from mental disorder of any description, and other persons aged 18 or over who are substantially and permanently handicapped by illness, injury, congenital deformity or such other disabilities’.
- Disabled Persons (Services, Consultation and Representation) Act 1986 strengthened the legislation laid down in the Chronically Sick and Disabled Persons Act. Section 4 of the new act gave local authorities the duty to assess people with disabilities for services if asked to do so by the individual, their representative, or carer.
- NHS and Community Act 1990 - replaced and brought together several pieces of law and placed a responsibility on local authorities to undertake an assessment where a person may be in need of such as a result of illness, disability or impairment (s47), the local authority has a duty to provide services if the needs are assessed as eligible.

Specific Policy Context includes:

- Valuing People (2001) a new strategy for learning disability for the 21st century was the first White Paper on learning difficulties for thirty years which set out a programme of change for people with learning difficulties. Based on four key principles: civil rights, independence, choice and inclusion, Valuing People highlighted the need for improvements in education, social services, health, employment, housing and support for people with learning difficulties and their families and carers.
- The Our Health, Our Care, Our Say White Paper in 2006 reaffirmed the commitment to health checks and placed a stronger emphasis on health and well-being, prevention of ill health and early intervention.
- Equal access to services was identified as a priority within Standards for Better Health (Healthcare Commission, 2006). In the same year the Foundation for People with Learning Difficulties published the ‘Better Metrics’ report which included 12 ‘metrics’ on health equity and access for people with learning difficulties.
- In 2007 ‘Commissioning Specialist Adult Learning Difficulties Health Services: Good Practice Guidance’ included guidance on commissioning specialist community healthcare services and the importance of employment of Learning Difficulties specialist staff within the NHS.
- ‘Valuing People Now’ (2009) was a three year strategy for people with learning difficulties and was the Government’s response to the recommendations in ‘Healthcare for All’.
- Transforming Care -a national response. The final report into the events at Winterbourne View Hospital published in December 2012 by the

Department of Health along with the accompanying Concordat:
Programme of Action.

The legislation and policy context also require the NHS to work with partners to improve access to mainstream services and to support the planning process for young people from the age of 14 to make the transition into adulthood.

Effective transition from young people to adults is achieved through staff based in the Learning Difficulties Health Hub working proactively with partner agencies to contribute to assessments and planning on the agreed transitioning pathway. The Learning Difficulties Health Hub will be responsible for monitoring and reporting this activity.

The new service will support people into old age. However, there may be circumstance where accessing services for older people may be more appropriate.

The new service is therefore expected to have a *positive impact* for adult LD service users.

7.3.2 Disability

The new service will focus on adults with learning difficulties. See above for policy and legislative context.

The service specification includes support for people with autism who also have learning difficulties. Where there is an absence of a diagnosis of learning difficulties a referral will be made to the relevant service. People with learning difficulties and physical or mental health needs will be supported through a named worker and detailed support planning to access appropriate mainstream service initially via their GP, but also through the multidisciplinary team in the Health Hub directly with mainstream service providers.

Support for all people will be person centred, included individual outcomes and be developed with the person using the service and their circle of support. The Learning Difficulties Health Hub will be responsible for monitoring and reporting this activity.

The new service is therefore expected to have a *positive impact* for disabled adult LD service users.

7.3.3 Gender Reassignment

Service Specification 12.1 & 12.2.3 focus is on person centred planning. See Service Specification Clauses outlined in section 7.2 above.

The whole ethos of this service would be to focus on the needs, aspirations and life choices of the individual. The service would provide appropriate support particularly in respect of:

- Assessing mental capacity

- Supporting informed choice
- Facilitating shared decision making
- Providing communication support
- Training and advice to staff in mainstream services

The Learning Difficulties Health Hub will be responsible for monitoring and reporting this activity.

The new service is therefore expected to have a *positive impact* for adult LD service users who are transgender.

7.3.4 Marriage and Civil Partnership

See service specification described in 7.2 above.

The new service is therefore expected to have a *positive impact* for adult LD service users who are married or in civil partnerships.

7.3.5 Pregnancy and Maternity

See service specification and service ethos described in 7.2 above

The new service is therefore expected to have a *positive impact* for adult LD service users who are pregnant.

7.3.6 Race

See Service Specification Clause outlined in section 7.2 above.

Staff in the new service will be expected to provide a service based on principles of non discriminatory practice and sensitivity to an individual's religious, cultural, ethnic and sexual orientation. This applies to all aspect of the service from initial contact, assessment, service provision and review.

Information would be provide in appropriate language and formats and customised to the needs of the individual. If necessary the service would access specialist interpretation services to facilitate communication.

The service provider will have in place appropriate training programmes for all staff groups which include:

- Person Centred Approaches/values based practice
- Communication
- The requirements and responsibilities under the Equality Act 2010 and the Human Rights Act 1984
- Learning Difficulties Awareness
- Carers Awareness, assessment and support
- Challenging behaviour, including using recognised restraints techniques with clear risk management strategies to support the use of these techniques.
- Speaking Up, empowerment and how people who use the service are involved

All aspects of the above will be monitored and reported to the commissioners on a regular basis.

The service specification is designed such that the provider will be expected to work with other agencies; particularly the local authority Gypsy & travellers' team, to identify and proactively engage with individuals and families so they can better access the service and influence service developments above and individual package of support.

A similar approach would be adopted as outlined above in respect of South Asian communities or any community or group which traditionally find it difficult to access statutory services. The Learning Difficulties Health Hub will be responsible for monitoring and reporting this activity

The new service is therefore expected to have a *positive impact* for adult LD service users from different ethnic or cultural backgrounds.

7.3.7 Religion or belief

See Service Specification Clause outlined in section 7.2 above

As a consequence, the new service provider is expected to offer a service based on principles of equality and non discrimination and sensitivity to individuals religious and cultural diversity. This will include recording and ensuring staff

- Respect festive periods, significant dates/events
- Foods preferences
- Customs

This will include ensuring that the service is provided in the person's own home if that is their choice, matching staff to the person's gender and being innovative and flexible on the delivery of support packages.

The new service is therefore expected to have a *positive impact* for adult LD service users from different religious backgrounds or beliefs.

7.3.8 Sex [gender]

See Service Specification Clause outlined in section 7.2 above

The new service is therefore expected to have a *positive impact* for adult LD service users irrespective of their sex.

7.3.9 Sexual Orientation

See Service Specification Clause outlined in section 7.2 above

The new service is therefore expected to have a *positive impact* for adult LD service users whatever their sexual orientation may be.

THE FOLLOWING CONSIDERS THE IMPACT ON GROUPS NOT COVERED BY THE EQUALITY ACT 2010:

7.3.10 Impact on Carers and Families

The Service Specification requires the provider to deliver greater flexibility in respect how, where and when the services are delivered to ensure more family orientated services. This includes:

- Provision of information on website to facilitate ease of access
- Contact with the service by telephone and email
- Appointments by clinicians in the persons own home or community setting
- Out of hours services covering weekends and evenings
- Involving family carers in the assessment and monitor of support plans
- Involvement of family carers in assessing service quality and the wider development of the service
- Provision of carers' assessment.

The new service is therefore expected to have a *positive impact* for families and carers of adult LD service users.

7.3.11 Impact on Staff

South Gloucestershire PCT/CCG is following a clear process regarding the staff transfer process relating to this procurement exercise. The PCT/CCG has already written to the current service provider and confirmed its position regarding the position of staff in relation to the re-tendering of the Community Health Services contract in South Gloucestershire. The letter states that the PCT/CCG considers that the Transfer of Undertakings (Protection of Employment) Regulations 2006 will apply to the change in service provider for the provision of these services.

In addition, the PCT/CCG has indicated that it will require completion of detailed staff information as part of the TUPE transfer due diligence process, together with comprehensive details relating to terms and conditions of employment, pay and pensions arrangements (copy of list of requirements attached for reference). A project plan relating to the transfer of staff has been developed which outlines the various stages of the staff transfer process and the responsibilities of the various parties involved in the service change provision process

The new service is therefore expected to have a *neutral impact* for existing staff of the existing services.

7.3.12 Impact of a Non-NHS Provider

The tendering process is designed to assess the **suitability, capability and experience** of potential providers. This is achieved by:

- Pre Tender Quality Questionnaire
- Multi dimensional assessment of Invitation to tender
- Interview of short listed candidate

People with learning difficulties have been involved in the development of the specification and the above evaluation process. There is an expectation that short listed providers will be able to evidence:

- Evidence of an Enhanced Quality Assurance Framework
- Commitment to the Mencap "Getting it Right" charter.
- Commitment to good employment practice for disabled people.

Clause 10.4.2 of the service Specification requires that the service is provided by competent, skilled and appropriately registered staff with investment in training and development. This applies not just for specialist professionals but also for families and for front line support staff to enable them to better support people where they live.

The new service is therefore expected to have a *positive impact* for adult LD service users and their families and carers.

8. MEETING THE PUBLIC SERVICE EQUALITY DUTY

8.1 *Measures to eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act*

The invitation to tender section 1.3 and sections 10.4.10, 13.5 and 16.4 of the service specification outline the provider's responsibilities to comply with the Equality Act;

The invitation to tender section Sections 3.2, 3.5 and 5.10 and sections 13.4 of the service specification outline the requirements in respect of safeguarding.

8.2 *Equality of opportunity between people who share a relevant protected characteristic and people who do not share it.*

There are a number of elements of the specification which seeks to improve equality of opportunity by minimising disadvantages and encouraging people with learning difficulties participate in public life or in other activities where their participation is low. Relevant clauses in the specification include:

- Section 1.2, 9.1 and 9.5 deal with health inequalities
- Section 1.7 - accessing mainstream services
- Section 1.9 – principles of rights, independence, control and inclusion
- Section 5.4 & 10.3 – making reasonable adjustments
- Section 8.1 & 10.2 – improving life opportunities
- Section 8.2 – promoting independence, choice and control
- Section 11 – maximising independence, self determination, involvement of services and families using co-production and developing community participation.
- Section 12.2.8 – developing opportunities in respect of employment, housing and education

8.3 Fostering Good Relations

There are a number of elements of the specification which looks to foster good relations between people who share a relevant protected characteristic and those who do not share it. Relevant clauses in the specification include:

- Section 1.5 - social model of disability;
- Section 1.9 – principles of rights, independence, control and inclusion
- Section 11.1 – Core Values
- Section 12.1, 12.2.6 and Section 13.4 – Challenging and training health care profession, carers and other agencies

9. OVERALL ASSESSMENT

This Equality Impact Assessment has reviewed the procurement process and the service specification for the new South Gloucestershire Specialist Community Health Services for People with Learning Difficulties. The assessment has reviewed the impact on all protected characteristics under the Equality Act 2010 and those additional issues, such as impact on staff, impact on carers, and the impact for the CCG on meeting the Public Sector Equality Duty.

The overall Equality Impact Assessment is that the procurement of a new South Gloucestershire Adult Community Health Services will deliver improved outcomes for people with learning difficulties and their families by improving access to mainstream health services and providing specialist support.

The above assessment indicates the procurement process will have a positive impact by improving equality of opportunity, minimising disadvantages and discrimination and fostering good relations for those people who share a relevant protected characteristic.

There is a neutral impact of the procurement upon staff who currently provide the services.

Finally, the Equality Impact Assessment indicates that the procurement of the South Gloucestershire Adult Community Health Services meets the requirements of the Public Service Equality Duty for the South Gloucestershire CCG.

10. COMMISSIONING LEAD SIGN-OFF

Dr Kathryn Hudson PhD
Head of Partnerships and Joint Commissioning; NHS South Gloucestershire CCG

Equalities Impact Assessor:
Nigel Roderick, Equalities and Patient and Public Involvement Officer; NHS South Gloucestershire CCG

11. DATE COMPLETED

March 2013