



South Gloucestershire Clinical Commissioning Group

EQUALITY IMPACT ASSESSMENT

NAME OF SERVICE/POLICY/STRATEGY BEING ASSESSED:

RECORDS MANAGEMENT POLICY

DETAILS OF LEAD COMMISSIONER OR CSU STAFF COMPLETING THIS SCREENING:

Name	Susan Brown / Nigel Roderick
Title	Head of Governance and Quality / FOI Manager & Equalities
Dept/Service	Nursing Governance and Quality
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APPROVED AND SIGNED BY RELEVANT DIRECTOR:

Name	Anne Morris
Title	Director of Nursing and Quality
Date	January 2016

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 POLICY AND ITS AIMS/OBJECTIVES:

This is primarily a policy for CCG staff, the application and implementation of which has an impact on the organisation, patients and CSU staff.

The purpose of this policy is to provide a framework to enable the CCG to set its processes around records management, for both electronic and paper records and to comply with appropriate legislation and government policy on information.

The aim of the policy is to ensure effective management of records by:

- Clarifying roles and responsibilities
- Ensuring staff awareness and ownership of issues pertaining to records management
- Putting in place a robust records management framework (incorporating appropriate access controls)

2. IS THIS SERVICE/POLICY ...

New <input type="checkbox"/>	Existing <input type="checkbox"/>	Refreshed <input checked="" type="checkbox"/>
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3. WHO IS THIS SERVICE/POLICY/STRATEGY LIKELY TO HAVE AN IMPACT ON?

Patients <input checked="" type="checkbox"/>	Carers <input type="checkbox"/>	Visitors <input type="checkbox"/>	Staff <input checked="" type="checkbox"/>
Other <input checked="" type="checkbox"/> [Please state who] South Central and West CSU			

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"/>		None
Research Findings	<input type="checkbox"/>		None
Recent Consultations and Surveys	<input type="checkbox"/>		None.
Results of: ethnic monitoring data; and any equalities data from the local authority / joint services; or Health inequality data	<input type="checkbox"/>		None
Anecdotal information from groups and agencies within South Gloucestershire	<input type="checkbox"/>		None
Comparisons between similar functions / policies elsewhere	<input type="checkbox"/>		Information governance policy
Analysis of PALS, complaints and public enquires information	<input type="checkbox"/>		None
Analysis of audit reports and reviews	<input type="checkbox"/>		None
Other:	<input type="checkbox"/>		None

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+]			✓	The policy applies equally to all ages of staff. There are no perceived differences in understanding and applying the policy by different age groups.
Disability Physical Impairment; Sensory Impairment; Mental Health; Learning Difficulty; Long-Term Condition			✓	The policy applies equally to all staff. However , the CCG needs to ensure that the policy is available in a suitable format if an employee's disability requires it e.g. Braille for a staff member who is blind or has very poor vision; or Easy Read for a staff member with Learning Difficulties.
Gender Reassignment [Trans people]			✓	The policy applies equally to all staff. There are no perceived differences in understanding and applying the policy by trans staff.

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
Race			✓	The policy applies equally to all staff. Staff working in the CCG are required to have a reasonable knowledge of written and spoken English which is sufficient for all staff irrespective of their ethnic background.
Religion or Belief			✓	The policy applies equally to all staff. There are no perceived differences in understanding and applying the policy by staff whether they have or have not a religious belief or faith or have none.
Sex [Male or Female]			✓	The policy applies equally to all staff. There are no perceived differences in understanding and applying the policy by staff irrespective of their sex.
Sexual Orientation			✓	The policy applies equally to all staff. There are no perceived differences in understanding and applying the policy by staff irrespective of their sexual orientation

- **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. ELIMINATING DISCRIMINATION, HARASSMENT AND VICTIMISATION

The policy documents the processes and procedures required to comply with appropriate legislation and government policy on recording, storing and using information.

The application of this policy will serve to reduce any potential discrimination, harassment or victimisation by staff towards patients or each other. That is to say information cannot be misused to discriminate, harass or victimise another member of staff or patients.

7. ADVANCE EQUALITY OF OPPORTUNITY

Not applicable.

The policy has a neutral impact across all protected characteristics.

The CCG is a small organisation [less than 50] and all policies are considered by a staff group and their recommendations taken into account by the Quality and Governance committee before being adopted.

8. FOSTER/PROMOTE GOOD RELATIONS BETWEEN PEOPLE

Not applicable.

9. 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		✓	Universal policy, not applicable.
Equality Related Performance Indicators		✓	Universal policy, not applicable.

10. ACTION PLAN

None required.

11. RECOMMENDATIONS FOR THE PROJECT BOARD/CCG GOVERNING BODY

a) Explain how the results of this assessment have influenced your service/policy/strategy
The assessment has confirmed that the policy treats all staff equally.

b) Use this section to also draw attention to any issue where there has been a significant impact, and demonstrate how you either propose to mitigate it [cross reference to action plan] or if you cannot, why you cannot.
The policy has a neutral impact on all the protected characteristics. However, the policy needs to be available in an alternative format should the CCG have a member of staff that requires it e.g. braille.

N.B. You can then use this section for the relevant equalities paragraph in the covering board/governing body paper.

12. DATE EQIA COMPLETED: 29 JANUARY 2016

13. REVIEW DATE: JANUARY 2019

Equality Impact Assessment – Background Information

Before you start, please ensure that you have completed the online training available on the MLE <http://nhssw.e2train.com/southwest>

In completing this assessment you should keep the Equality Duty set out in the Equality Act 2010 in mind. The Duty has three aims. It requires public bodies to have **due regard** to the need to:

- **eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the Act;
- **advance equality of opportunity** between people who share a protected characteristic and people who do not share it; and
- **foster good relations** between people who share a protected characteristic and people who do not share it.

This EqIA is based on the following principles, drawn from case law and provides the essential information to enable us to fulfil our Equality Duty. Public bodies are expected to ensure:

Knowledge – those who exercise the public body’s functions need to be aware of the requirements of the Equality Duty. Compliance with the Equality Duty involves a conscious approach and state of mind.

Timeliness – the Equality Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken – that is, in the development of policy options, and in making a final decision. A public body cannot satisfy the Equality Duty by justifying a decision after it has been taken.

Real consideration – consideration of the three aims of the Equality Duty must form an integral part of the decision-making process. **The Equality Duty is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.**

Sufficient information – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty.

No delegation – public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.

Review – public bodies must have regard to the aims of the Equality Duty not only when a policy is developed and decided upon, but also when it is implemented and reviewed. The Equality Duty is a continuing duty

Completing this assessment will help us demonstrate compliance with the Equality Duty

Please use a minimum 12 pt font size. This assessment must be signed off by the relevant director and will be made publicly available on our website.