# Equality impact assessment (EqIA)

This impact assessment should be completed for all human resources (HR) and corporate policies, projects or functions that apply to colleagues at NHS Humber and North Yorkshire Integrated Care Board (ICB).

There are five sections of this assessment, and all should be completed:

1. [HR / corporate impact analysis](#_HR_/_corporate)
2. [Equality data](#_Equality_data)
3. [Impact assessment](#_Impact_assessment)
4. [Action planning](#_Action_planning)
5. [Sign-off](#_Sign-off)

## HR / corporate policy impact analysis

| **Key questions** | **Information provided** |
| --- | --- |
| Policy / ~~project / function:~~ | Counter Fraud Policy |
| Date of analysis: | 9/3/23 |
| Completed by: (name, department, place) | Andy Growns  Head of Compliance, HNY ICB |
| Aims and intended effects of this policy, project or function: | The aims of this policy are:   * To ensure the ICB has appropriate counter fraud procedures as directed by NHS England and the Bribery Act 2010 * To provide a guide for those working for the ICB on what fraud is and how to report concerns. * To inform those working for the ICB of their responsibility to prevent fraud, bribery and corruption. * To detail the roles and responsibilities of key staff and departments * To detail the potential outcomes where fraud, bribery and corruption are suspected |
| Details of any significant changes to previous policy likely to have an impact on colleagues / other groups: | No significant changes to policy; key amendments recognise establishment of the ICB, associate policy titles, job titles etc but policy largely identical to the former CCG policies covering the same area. |
| List of any other policies that are related to or referred to as part of this analysis: | Code of Conduct & Behaviour Policy  Conflicts of Interest Policy  Disciplinary Policy  Raising Concerns Whistleblowing Policy  Redress Policy and Procedure |
| Who the policy, project or function will affect: | This policy applies to all personnel working for or on behalf of the ICB, including but not limited to employees (regardless of position held or employment status), consultants, volunteers, contractors, staff engaged via a third- party supplier, honorary contract holders and/or any other parties that have a business relationship with the ICB. |
| Engagement / consultation that has been done or is planned for this policy and this EqIA: | None required – policy is predominantly identical to the former CCG policies where no impact on equality was determined. |

## Equality data

Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share one or more of the nine protected characteristics as detailed in the [Equality Act (2010)](https://www.gov.uk/guidance/equality-act-2010-guidance).

Examples of equality date could include:

* recruitment data (e.g., number of applications compared to our population profile, number of appointments)
* complaints made by groups who share / represent one or more protected characteristic
* grievances, decisions upheld or dismissals by protected group
* findings of the NHS Staff Survey
* data from the Workforce Race Equality Standard (WRES) and Workforce Disability Equality Standard (WDES) reports

This list is not exhaustive.

| **Key questions** | **Information provided** |
| --- | --- |
| Is any equality data available relating to the use of this policy / project / function: | ~~Yes~~ / No (delete as appropriate) |
| **If yes**  List the equality used to assess the impact of this policy / project / function: |  |
| **If no**  List the data you will use to assess the impact of this policy / project / function: | Any regular (routine) and annual reporting information from LCFS andNHS Counter Fraud Authority (NHSCFA) that allows us to assess the impact of this policy on equality. |

## Impact assessment

Details of any potential impact of this policy / project or function on people from different protected characteristic groups should be included below.

This should be based on analysis of:

* the [equality data](#_Equality_data) listed
* insights gathered through engagement
* your knowledge of the substance of this policy

| **Protected characteristic** | **No  impact?** | **Positive impact?** | **Negative impact?** | **Evidence of impact and, if applicable, justification where are ‘genuine determining reason’ exists (see footnote)** |
| --- | --- | --- | --- | --- |
| **Age**  This refers to people of all ages. |  |  |  | No evidence of impact |
| **Disability**  People who have physical disabilities and / or impairments, learning disabilities, learning differences (for example, someone who is neurodiverse), people with mental health conditions, sensory loss and long-term chronic conditions (such as diabetes, HIV) or hidden, invisible or variable conditions |  |  |  | No evidence of impact |
| **Gender reassignment**  Refers to someone who is proposing to, is going through or has gone through a process to live in a gender that is different to the one assigned at birth.  For example, Trans (transgender) people, non-binary people or gender fluid / gender queer people. |  |  |  | No evidence of impact |
| **Marriage or civil partnership** Refers to legally recognised partnerships (applies to employment only). |  |  |  | No evidence of impact |
| **Pregnancy and maternity**  Refers to the pregnancy period and the first year after birth. |  |  |  | No evidence of impact |
| **Race**  Refers to people of different races which can include colour, nationality, ethnic or national origins and different ethnic backgrounds, for example, Gypsy Romany and Traveller peoples. |  |  |  | No evidence of impact |
| **Religion or belief**  Includes all religious and philosophical beliefs including having no religious belief, |  |  |  | No evidence of impact |
| **Sex**  This refers to biological sex eg male / female / intersex. |  |  |  | No evidence of impact |
| **Sexual orientation**  Refers to who a person is attracted to, for example gay, lesbian, bisexual, asexual and heterosexual (straight). |  |  |  | No evidence of impact |
| **Socio-economic deprivation** Refers to the different financial situations people may be experiencing, for example, working poverty and cost of living impacts for people from different backgrounds (not Band exclusive) |  |  |  | No evidence of impact |
| **Working carers** Refers to anyone who cares, unpaid, for a friend or family member who due to their illness, disability, mental health condition or an addiction cannot cope without their support.  Working carers can be considered protected under the Equality Act (2010) by association. |  |  |  | No evidence of impact |

‘Genuine determining reason’ means an action is proportionate to the legitimate aims of the organisation (please seek further advice).

## Action planning

As a result of the analysis of the impact of this policy / project or function on people from different protected characteristic groups, this section should detail the mitigating actions to be taken to reduce any identified impacts and those responsible for ensuring these actions are taken.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Identified risk** | **Recommended actions** | **Responsible lead** | **Completion date** | **Review  date** |
| None identified – policy targets all those covered by the policy regardless of protected characteristics groups. |  |  |  |  |
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## Sign-off

All EqIAs for HR and corporate policies, projects or functions that apply to ICB colleagues must be signed-off by the corporate affairs team - send a copy of the relevant policy and EqIA to: [hnyicb-hull.hnypolicyenquiries@nhs.net](mailto:hnyicb-hull.hnypolicyenquiries@nhs.net)

|  |  |
| --- | --- |
| **Key questions** | **Sign-off responses** |
| I agree / disagree with this assessment and action plan | Yes |
| **If no (you disagree)**  Reasons for not approving and actions that should be taken (including timelines and those responsible): |  |
| Signed: | G Mazingham |
| Date: | 03/07/2023 |

ENDS