**Integrated Impact Assessment (IIA)**

**Internal (HNYICB) Policy or Project**

This impact assessment should be completed to systematically consider relevant evidence against the implementation of, or, proposals for change to policies or projects that apply only to colleagues at NHS Humber and North Yorkshire Integrated Care Board (ICB).

Any change to policies, projects or services that will have an impact on the public will require a full impact assessment.

There are 8 sections to this assessment which should be completed before the policy or project implementation or change is considered for approval:

1. Summary
2. Supporting documents
3. Workforce, including Equality Data
4. Sustainability
5. Finance
6. Digital
7. Data Protection
8. Engagement/ Consultation
9. **SUMMARY**

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| --- | --- |
| **Policy or Project Name:** | Conflicts of Interests Policy (including Gifts, Hospitality and Sponsorship) |
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| **Aims and intended effect of this policy/ project change or implementation:** | NHS Humber and North Yorkshire ICB strives to always achieve the highest standards of business conduct and is committed to conducting its business with honesty and impartiality. One of the overriding objectives of the ICB is to ensure that decisions made by the ICB are both taken, and taken to be seen, without any possibility of the influence of external or private interest.  NHS Humber and North Yorkshire ICB recognises that conflicts of interest are unavoidable and therefore has in place arrangements to seek to manage them. The Health and Social Care Act 2022 (“the Act”) sets out the minimum requirements of what both NHS England and NHS Humber & North Yorkshire must do in terms of managing conflicts of interest. The measures outlined in this policy are aimed at ensuring that decisions made by the ICB will be taken, and be seen to be taken, uninfluenced by external or private interests.  The aim of this policy is to protect both the organisation, and the individuals involved from any appearance of impropriety and demonstrate transparency to the public and other interested parties. |
|  |  |
| **Details of any significant changes to the previous policy or project that is likely to have an impact on workforce or other groups:** | The amendments reflect the changes required in accordance with updated NHS England guidance on preparing integrated care board constitutions and governance and the NHS-wide guidance, managing conflicts of interest in the NHS: for staff. |
|  |  |
| **List of any other polices or projects that are related to or referred to as part of this analysis** | Humber and North Yorkshire ICB’s Constitution, incorporating Standing Orders  Code of Conduct and Behaviours Policy  Freedom to Speak Up Policy  Local Anti-Fraud, Bribery and Corruption Policy  Procurement Policy  Induction Policy  Data Protection and Confidentiality  Disciplinary Policy  Policy for the Sponsorship of activities and Joint Working with the pharmaceutical medical appliances and health technology industries. |
|  |  |
| **Who the policy or project will affect:** | This policy applies to:  All ICB employees, including:  • All full and part-time staff.  • Any staff on sessional or short-term contracts.  • Any students and trainees (including apprentices).  • Agency staff; and  • Seconded staff.  In addition, any self-employed consultants or other individuals working for the ICB under a contract for services should make a declaration of interest in accordance with this guidance, as if they were ICB employees.  • Members of the ICB, all members of the ICB’s committees, sub-committees, and sub-groups, including:  • Co-opted members.  • Appointed deputies; and  • Any members of committees/groups from other organisations. (Who may not be directly employed or engaged by the organisation, for example staff employed/engaged by member organisations of Humber & North Yorkshire Integrated Care Board). |
|  |  |
| **Does the implementation or change to the policy or project rase any ethical dilemmas?**  **If yes: has this been referred to the System Ethics Group?** | No  N/A |
|  |  |
| **Completed by:** | Directorate: Corporate Affairs  HNYICB Place: HNYICB  Date: 04/11/2024 |
|  |  |
| **Approved by:**  ***All IIA’s for internal policies or projects must be signed off by the Corporate Directorate. Please send this IIA and the supporting document to*** [**hnyicb-hull.hnypolicyenquiries@nhs.net**](mailto:hnyicb-hull.hnypolicyenquiries@nhs.net) | Name: Gemma Mazingham  Directorate: Corporate Directorate  HNYICB Place: HNYICB  Date: 06/11/2024 |

1. **SUPPORTING DOCUMENTS**

Please include any relevant documents relating to your change or implementation of a new policy or project.

(To embed a document, go to Insert; Object; Create from file, then click brownse and select your document from where it is saved. Select the tick box for display as icon, then select Change icon and you can amend the text that will appear below your document).

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| **Document Name** | **Embedded document** |
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1. **WORKFORCE, INCLUDING EQUALITY DATA**

Please consider the following areas in the context of the implementation of your policy or project or, the change to your policy or project :

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Area** | **Positive Impact?** | **Neutral Impact** | **Negative Impact** | **Evidence of impact and, if applicable, justification where are ‘genuine determining reason’ exists (see footnote)** |
| **Effective prioritisation and management of workload** |  |  |  | N/A. |
| **Staff experience as a result of workforce changes** |  |  |  | N/A |
| **Contractual obligations** |  |  |  | Application of the policy is fair and consistent and sets out the requirements to support colleagues working on behalf of NHS Humber and North Yorkshire ICB or providing services or facilities to the ICB. Individuals making decisions for Humber & North Yorkshire ICB will act in the public interest and the interest of the ICB, avoiding any personal, financial, professional, or organisational conflicts.” |
| **Workplace** |  |  |  | N/A |
| **Sustainability of service due to workforce issues** |  |  |  | N/A |
| **Support for whole system workforce integration (ICS)** |  |  |  | ICBs are designed to bring together partners from across the ICS in the interests of the local population, enabling trusts/foundation trusts, local authorities, and primary medical services (general practice) provider nominees to have a role in decision-making. It is expected these individuals will act in accordance with the first principle (their role on the ICB) |
| **Support for workforce planning** |  |  |  | N/A |
| **Support for colleague health and wellbeing** |  |  |  | N/A |

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

**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).

When considering workforce equality impacts, 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

|  |  |
| --- | --- |
| **Key Questions** | **Information provided** |
| Is any equality data available relating to the use of this policy / project. | **No** |
| **If yes**  List the equality used to assess the impact of this policy / project / function: | N/A |
| **If no**  List the data you will use to assess the impact of this policy / project / function: | Application of the policy is fair and consistent and does not have any impact on the protected characteristic. This will be monitored as part of the policy review process, or any feedback following implementation and acted on accordingly. |

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

This should be based on analysis of:

* the equality data listed above
* insights gathered through engagement
* your knowledge of the substance of this policy or project

| **Protected characteristic** | **Positive Impact** | **Neutral**  **Impact** | **Negative Impact** | **Evidence of impact and, if applicable, justification where are ‘genuine determining reason’ exists (see footnote)** |
| --- | --- | --- | --- | --- |
| **Age**  This refers to workforce of all ages. |  |  |  | Application of the policy is fair and consistent regardless of age and therefore has no impact on this protected characteristic. |
| **Disability**  Colleagues 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 |  |  |  | Application of the policy is fair and consistent regardless of disability and therefore does not have an impact on this protected characteristic |
| **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. |  |  |  | Application of the policy is fair and consistent and does not have an impact this protected characteristic. |
| **Marriage or civil partnership** Refers to legally recognised partnerships (applies to employment only). |  |  |  | Application of the policy is fair and consistent regardless of marital status and therefore has no impact on this protected characteristic. |
| **Pregnancy and maternity**  Refers to the pregnancy period and the first year after birth. |  |  |  | Application of the policy is fair and consistent regardless of pregnancy or maternity and therefore has no impact on this protected characteristic |
| **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. |  |  |  | It is recognised that this policy is written in England and there is a risk to any member of staff whose first language is not English, and support will be offered to ensure the policy is translated to the required language. |
| **Religion or belief**  Includes all religious and philosophical beliefs including having no religious belief, |  |  |  | Application of the policy is fair and consistent regardless of Religion or belief and therefore does not have an impact on this protected characteristic. |
| **Sex**  This refers to biological sex eg male / female / intersex. |  |  |  | Application of the policy is fair and consistent regardless of sex and therefore does not have an impact on this protected characteristic. |
| **Sexual orientation**  Refers to who a person is attracted to, for example gay, lesbian, bisexual, asexual and heterosexual (straight). |  |  |  | Application of the policy is fair and consistent regardless of sexual orientation and therefore does not have an impact on this protected characteristic. |
| **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) |  |  |  | Deprivation data is not routinely collected for employees and therefore no analysis of this is used for policy development. However, there is no anticipated 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. |  |  |  | Working Carers data is not routinely collected for employees and therefore no analysis of this is used for policy development. However, there is no anticipated impact |

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

1. **SUSTAINABILITY**

Sustainability = how to meet the needs of the current generation without compromising the ability of future generations to meet their needs. This area includes waste and pollution, recycling, use of resources, ethical purchasing, biodiversity, provision of green spaces.

| **AREA** | **Positive Impact** | **Neutral Impact** | **Negative Impact** | **Evidence of impact and, if applicable, justification where are ‘genuine determining reason’ exists (see footnote)** |
| --- | --- | --- | --- | --- |
| **Travel**   * Will it provide / improve / promote alternatives to car-based transport and promote active travel (cycling, walking)? * Will it support more efficient use of cars (car sharing, low emission vehicles, environmentally friendly fuels and technologies)? * Will it reduce ‘care miles’ (telecare, care closer) to home? * Will it improve access to opportunities and facilities for all groups? |  |  |  | N/A |
| **Procurement**   * Will it specify social, economic and environmental outcomes to be accounted for in procurement and delivery? * Will it stimulate innovation among providers of services related to the delivery of the organisations’ social, economic and environmental objectives? * Will it promote ethical purchasing of goods or services? * Will it obtain maximum value from pharmaceuticals and technologies (medicines management, prescribing, and supply chain)? * Will it support local or regional supply chains? * Will it make current activities more efficient or alter service delivery models |  |  |  | Procurement should be managed in an open and transparent manner, compliant with procurement and other relevant law. Procurement processes should be conducted in the best interest of patients.  The ICB takes appropriate measures to effectively prevent, identify and remedy conflicts of interest arising in the conduct of procurement processes under The Health Care Services (Provider Selection Regime) Regulations 2023 (‘PSR Regulations’).  The procedure for managing conflicts of interest during procurements is set out in the ICB’s Procurement Policy. |
| **Facilities Management**   * Will it reduce the amount of waste produced or increase the amount of waste recycled? * Will it reduce water consumption? |  |  |  | N/A |
| **Social Value**   * Will it provide employment opportunities for local people? * Will it promote or support equal employment opportunities and/ or offer employment opportunities to disadvantaged groups? * Will it promote healthy working lives (including health and safety at work, work-life/home-life balance and family friendly policies)? |  |  |  | N/A |
| **Community Engagement**   * Have you sought the views of our communities in relation to the impact on sustainable development for this activity |  |  |  | N/A |
| **Buildings**   * Will it increase safety and security in new buildings and developments? * Will plans include improvement to the biodiversity of the area? * Will it improve access to the built environment? * Will plans have sufficient local infrastructure to support them? |  |  |  | N/A |
| **Partnership and Integration**   * Will it support for whole system workforce integration? * Will there be support for workforce planning? * Will it minimising ‘care miles’ making better use of new technologies such as telecare and telehealth, delivering care in settings closer to people’s homes? * Will it promote prevention and self-management? * Will it deliver integrated care, that co-ordinate different elements of care more effectively and remove duplication and redundancy from care pathways? |  |  |  | N/A |
| **CO2 reduction**   * Will it reduce the carbon footprint or be carbon neutral? * Will it improve the resource efficiency of new or refurbished buildings (water, energy, density, use of existing buildings, designing for a longer lifespan)? |  |  |  | N/A |
| * **Adaptation to Climate Change** * Does this take into account climate change risks for the area (increased flooding, higher summer temperatures)? |  |  |  | N/A |
| **Rural Proofing**   * Almost a third of the Places population live in rural areas – how will this course of action affect their ability to access services? Increases in age and disability lead to a reduced ability to drive and greater dependence on public transport. * Guidance available here: [https://www.gov.uk/government/publications/rural-proofing](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fpublications%2Frural-proofing&data=05%7C02%7Cg.mazingham%40nhs.net%7C2a4d5539265749d473d408dc394ae685%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638448243516517641%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Rw%2BS1jay8ttsVe0Qm%2Bt3V5vzXo71IpOcP6P6NC%2ByJME%3D&reserved=0) |  |  |  | N/A |

For further information see:

Greener NHS:  [https://www.england.nhs.uk/greenernhs/](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.england.nhs.uk%2Fgreenernhs%2F&data=05%7C02%7Cg.mazingham%40nhs.net%7C2a4d5539265749d473d408dc394ae685%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638448243516527948%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=%2FgTIQms5w7krb1Ve%2FXYC5RcfHa9CZeij409io7zo7uQ%3D&reserved=0)

Centre for Sustainable Healthcare: [https://sustainablehealthcare.org.uk/](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsustainablehealthcare.org.uk%2F&data=05%7C02%7Cg.mazingham%40nhs.net%7C2a4d5539265749d473d408dc394ae685%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638448243516535014%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=itZNDciYjZOqurrOuOHiJLbWIPO7gr%2FpxDEjJnwtc5k%3D&reserved=0)

1. **FINANCE**

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| --- | --- | --- |
| **Current spend (£ / £k / £million)** | N/A | |
| **Implementation date** |  | |
| **Type of savings** |  |  |
|  |  |
|  |  |
| **Potential Savings (gross)** If you have answered 'no savings' above you do not need to complete this question | Part year effect: |  |
| Full year effect: |  |
| **Potential Investment Needed (gross)** | Part year effect: |  |
| Full year effect: |  |
| **Net effect** | Part year effect: |  |
| Full year effect: |  |
| **Level of confidence in achieving savings - high/medium/low** |  | |

1. **DIGITAL**

The assessment will focus on ensuring that people are not digitally excluded and on making sur the right safeguards are in place.

Further information can be found here:

AI and Data Protection Risk Toolkit: [https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/artificial-intelligence/guidance-on-ai-and-data-protection/ai-and-data-protection-risk-toolkit/](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fico.org.uk%2Ffor-organisations%2Fuk-gdpr-guidance-and-resources%2Fartificial-intelligence%2Fguidance-on-ai-and-data-protection%2Fai-and-data-protection-risk-toolkit%2F&data=05%7C02%7Cg.mazingham%40nhs.net%7C2a4d5539265749d473d408dc394ae685%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638448243516540360%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=oCkQ%2BqGOehzQ%2FXGNYmKbJwXpWtIE8ZELffrxBbq4mjY%3D&reserved=0)

Digital Technology Assessment Criteria for Health and Social Care: [https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Ftransform.england.nhs.uk%2Fmedia%2Fdocuments%2FDTAC\_version\_1.0\_FINAL\_updated\_16.04.odt&wdOrigin=BROWSELINK](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fview.officeapps.live.com%2Fop%2Fview.aspx%3Fsrc%3Dhttps%253A%252F%252Ftransform.england.nhs.uk%252Fmedia%252Fdocuments%252FDTAC_version_1.0_FINAL_updated_16.04.odt%26wdOrigin%3DBROWSELINK&data=05%7C02%7Cg.mazingham%40nhs.net%7C2a4d5539265749d473d408dc394ae685%7C37c354b285b047f5b22207b48d774ee3%7C0%7C0%7C638448243516546171%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Qru6mh2PfW%2Fj43kAMsu65%2FsHuOngYlyi%2FRArIYADvlc%3D&reserved=0)

1. **DATA PROTECTION**

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| --- | --- | --- |
| **Screening Questions** | | **Tick if yes** |
| 1 | Will the project involve the collection of new identifiable or potentially identifiable data about individuals? (If the ICB do not process personal data but another organisation or a service provider does as part of the project, a DPIA must still be completed). |  |
| 2 | Will the project compel individuals to provide data about themselves or involve the processing of personal data not obtained directly from the individual? i.e. where they will have little awareness or choice or where it is impossible, or would involve disproportionate effort, to inform the individuals that the processing is taking place |  |
| 3 | Will identifiable data about individuals be shared with other organisations or people who have not previously had routine access to the data? |  |
| 4 | Are you using data about individuals for a purpose it is not currently used for or in a new way? i.e. using data collected to provide care for a service evaluation; data matching where data obtained from multiple sources is combined, compared or matched. |  |
| 5 | Where data about individuals is being used, would this be likely to raise privacy concerns or expectations? i.e. will it include health records, genetic data, criminal records or other information that people may consider to be sensitive and private and may cause them concern or distress. |  |
| 6 | Will the project require you to contact individuals in ways which they may find intrusive? i.e. telephoning or emailing them without their prior consent. |  |
| 7 | Will the project result in you making decisions in ways which can have a significant impact on individuals? i.e. will it affect the care a person receives? Is it based on automated decision making (including profiling)? |  |
| 8 | Does the project involve you using new technology which might be perceived as being privacy intrusive? i.e. using biometrics, facial recognition, Artificial Intelligence or tracking (such as tracking an individual’s geolocation or behaviour) |  |
| 9 | Is a service/processing activity being transferred to a new supplier/organisation (or re-contracted) at the end of an existing contract |  |
| 10 | Will the project involve systematic monitoring of a publicly accessible area on a large scale? i.e. use of CCTV |  |
| 11 | Will the project involve the targeting of children or other vulnerable individuals? i.e. for marketing purposes, profiling or other automated decision making |  |
| \* | If none of the above are applicable please tick to confirm you have considered completion of a DPIA and determined it is not required.  how the information on the register(s) may be used or shared, and that the register (s) will be published (if applicable). Is done by the provision of the ICB Privacy Notice. <https://humberandnorthyorkshire.icb.nhs.uk/privacy-policy/> |  |

1. **Engagement/ Consultation**

If there is likely to be an impact on workforce, engagement with the following groups should be made.

|  |  |
| --- | --- |
| **Group** | **Feedback** |
| **Social Partnership Forum (SPF)**  (please contact [hr.hnyy@nhs.net](mailto:hr.hnyy@nhs.net) for meeting dates and attendance) | Date attended:  Feedback received:  N/A |
| **Staff Wellbeing Group**  (please contact nicky.lowe@nhs.net for meeting dates and attendance) | Date attended:  Feedback received:  N/A |
| **Engagement/Consultation undertaken as part of the policy review/development** | Engagement/discussions have taken place within the corporate governance team and supporting staff including the Executive Director of Corporate Affairs.  Formal approval by the ICB Board.  No further engagement is deemed necessary. |