



**PWYLLGOR DIWYLLIANT, POBL A DATBLYGU SEFYDLIADOL
PEOPLE, ORGANISATIONAL DEVELOPMENT & CULTURE COMMITTEE**

DYDDIAD Y CYFARFOD: DATE OF MEETING:	13 October 2021
TEITL YR ADRODDIAD: TITLE OF REPORT:	Policy 153 - Hywel Dda University Health Board Equality Impact Assessment Policy and Procedure
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Ros Jervis, Director of Public Health
SWYDDOG ADRODD: REPORTING OFFICER:	Helen Sullivan, Head of Partnerships, Diversity and Inclusion

Pwrpas yr Adroddiad (dewiswch fel yn addas)

Purpose of the Report (select as appropriate)

Ar Gyfer Penderfyniad/For Decision

ADRODDIAD SCAA

SBAR REPORT

Sefyllfa / Situation

The attached Policy 153 – Hywel Dda University Health Board Equality Impact Assessment Policy and Procedure is an update of the existing policy and is being submitted to the People, Organisational Development and Culture Committee (PODCC) for approval.

The policy exists in order to assist Hywel Dda University Health Board (HDdUHB) in meeting its general duties under the Equality Act 2010 to eliminate discrimination, advance equality and foster good relations between those who share a protected characteristic and those who do not. It also assists HDdUHB in meeting its specific duties under the Public Sector Duties (Wales) 2011 to undertake equality impact assessments, including the impact of socio-economic disadvantage as required by the Socio-economic Duty that came in to force on 31st March 2021. The policy aligns with the Human Rights Act 2010 and the Welsh Language (Wales) Measure 2011. It assists HDdUHB to live its organisational values by prescribing and outlining a process of identifying potential negative impacts on protected groups at the earliest opportunity when making strategic decisions and planning, developing and delivering new services and policies and reviewing existing ones.

PODCC is requested to approve the updated Equality Impact Assessment Policy and Procedure.

Cefndir / Background

The Equality and Human Rights Commission state that “Impact Assessment is a process which enables an organisation to consider the effects of its decisions, policies, services on different communities, individuals or groups”.

All public sector bodies in Wales have a legal duty to undertake equality impact assessment (EqIA) as a requirement of legislation under the Equality Act 2010 and Public Sector Equality Duties (Wales) 2011. EqIAs provide a systematic method of ensuring that legal obligations are met and a practical means of examining new and existing policies and practices to determine what impact they may have on equality for those affected by the outcomes. The

need for collection of evidence to support decisions and for consultation means that EqIA is most effectively conducted as an integral part of policy development, service planning, development and review and all key decision making processes across all functions.

The Wales Act 2017 enabled Welsh Ministers to enact Part 1, section 1 of the Equality Act 2010 – the Socio-economic Duty, which came into force on 31st March 2021. It requires specified public bodies (including Health Boards), when making strategic decisions such as deciding priorities and setting objectives, to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. It also supports the implementation of all HDdUHB policies, procedures and functions.

In addition, the policy underpins the work of HDdUHB to meet its duties and objectives under the Well-being of Future Generations (Wales) Act 2015, Social Services and Well-being (Wales) Act 2014 and Standards for Health in Wales.

Asesiad / Assessment

There is a legal obligation to undertake equality impact assessments and this forms part of the Integrated Impact Assessment (IIA) processes within HDdUHB. Undertaking equality impact assessments will also contribute to HDdUHB's work towards meeting its obligations under the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Wellbeing (Wales) Act 2014. Within the policy, HDdUHB has made the following commitment in the policy statement:

“Hywel Dda University Health Board is committed to ensuring that EqIA is undertaken whenever required in order to contribute to decisions about policies and services. Undertaking an EqIA will ensure that the impact on different communities, individuals or groups are fully considered and any potentially discriminatory effect may be mitigated prior to implementation.

Assessing for impact also affords the opportunity to enhance any identified potential or actual positive impacts. It is the intention of HDdUHB, through robust assessing for impact, to fully consider the effects that decisions, policies or services have on people under the provisions of the Equality Act 2010, Human Rights Act 1998 and Welsh Language (Wales) Measure 2011. Undertaking robust EqIA will assist HDdUHB to develop and maintain equitable policies and practices for staff and service users.”

In addition to refreshing the policy, the main change is to ensure that Part 1, section 1 of the Equality Act 2010 – the Socio-economic Duty which came into force on 31st March 2021, is reflected. This new duty requires HDdUHB when making strategic decisions such as deciding priorities and setting objectives, to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. EqIA paperwork and guidance has also been updated to reflect the requirement to consider socio-economic impacts.

The Health Boards values which link in with our six strategic aims link very clearly with this policy. This means that all staff are obliged to adhere to the policy and will be required to complete an Equality Impact Assessment which is evidenced when submitting a policy, process or service change for approval. Support is available from the Diversity and Inclusion team should individuals need assistance in completing this process.

The updated policy and procedure supports the overarching Equality and Diversity Policy of the Health Board (Policy 133). It is also due for review and renewal and it was planned to present

this at the same time. However, work to refresh the Equality and Diversity Policy has been delayed due to contributing colleagues being required to prioritise work to support the COVID-19 pandemic response. It is proposed that the refreshed Equality and Diversity Policy will be presented to PODCC at its initial meeting of 2022.

Argymhelliad / Recommendation

The People, Organisational Development and Culture Committee is requested to **APPROVE** the updated Equality Impact Assessment Policy and Procedure.

The People, Organisational Development and Culture Committee is requested to **APPROVE** the request for an extension of time required to undertake a comprehensive review of the Equality and Diversity Policy.

Amcanion: (rhaid cwblhau) Objectives: (must be completed)	
Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.13 Approve workforce and organisational development policies and plans within the scope of the Committee.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	Not applicable
Safon(au) Gofal ac Iechyd: Health and Care Standard(s):	All Health & Care Standards Apply
Amcanion Strategol y BIP: UHB Strategic Objectives:	All Strategic Objectives are applicable
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report	2. Develop a skilled and flexible workforce to meet the changing needs of the modern NHS 4. Improve Population Health through prevention and early intervention, supporting people to live happy and healthy lives 5. Offer a diverse range of employment opportunities which support people to fulfill their potential 8. Transform our communities through collaboration with people, communities and partners

Gwybodaeth Ychwanegol: Further Information:	
Ar sail tystiolaeth: Evidence Base:	<ul style="list-style-type: none"> • Equality Act 2010 • Public Sector Equality Duties (Wales) 2011 https://hduhb.nhs.wales/about-us/governance-arrangements/equality-diversity-and-inclusion/the-equality-act-2010/ • Health Board’s Strategic Equality Plan and Objectives

	https://hduhb.nhs.wales/about-us/governance-arrangements/equality-diversity-and-inclusion/equality-diversity-and-inclusion-documents/strategic-equality-plan-and-objectives-for-2020-2024-pdf/
Rhestr Termau: Glossary of Terms:	Included in the body of the report
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Diwylliant, Pobl a Datblygu Sefydliadol: Parties / Committees consulted prior to People, Organisational Development & Culture Committee:	Workforce & OD Colleagues Public Health Colleagues

Effaith: (rhaid cwblhau) Impact: (must be completed)	
Ariannol / Gwerth am Arian: Financial / Service:	Undertaking timely and robust equality impact assessments will assist HDdUHB to target resources effectively and reduce the risk of challenges through judicial reviews and employment tribunals which can incur significant associated costs.
Ansawdd / Gofal Claf: Quality / Patient Care:	Driving robust scrutiny of Health Board proposals and written control documents, the policy assists in the identification of issues of relevance to protected groups which may otherwise have been missed. It facilitates fair and equitable treatment for all in relation to fairness, respect, equality, dignity and autonomy and equitable access to services and information, protecting patients and service users against discrimination, harassment and victimisation.
Gweithlu: Workforce:	The policy provides a framework for the robust scrutiny of health board proposals and written control documents. The policy facilitates consideration of fair and equitable treatment for all in relation to fairness, respect, equality, dignity and autonomy and equitable access to services and information. The policy protects staff against discrimination, harassment and victimisation in the workplace.
Risg: Risk:	The policy is designed to reduce the likelihood of risk by facilitating fair and equitable treatment of staff and service users and putting measures into place to address situations where the policy is not adhered to.
Cyfreithiol: Legal:	The policy is designed to reduce the likelihood of legal challenge by facilitating fair and equitable treatment of staff and service users and putting measures into place to address situations where the policy may not be adhered to. Non-compliance with the policy may result in legal challenges from staff, service users or members of the public in relation to failure to meet the duties of the Equality Act 2010, resulting in financial and reputational damage to the organisation.

<p>Enw Da: Reputational:</p>	<p>The policy is designed to reduce the likelihood of reputational damage by facilitating fair and equitable treatment of staff and service users and putting measures into place to address situations where the policy may not be adhered to. Non-compliance with the policy may result in legal challenges from staff, service users or members of the public in relation to failure to meet the duties of the Equality Act 2010, resulting in financial and reputational damage to the organisation.</p>
<p>Gyfrinachedd: Privacy:</p>	<p>Information gathered for equality data monitoring purposes can include details of sensitive personal information, however this data is anonymised in reports and cannot be traced back to the individuals concerned. Information will already be held on Electronic Staff Records and Health Records if individuals have agreed to supply the information on a voluntary basis. An explanation of why the information is being collected and what it will be used for is included on the relevant data collection forms.</p>
<p>Cydraddoldeb: Equality:</p>	<ul style="list-style-type: none"> • Has EqIA screening been undertaken? Yes • Has a full EqIA been undertaken? No <p>The policy prescribes a pro-active approach to equality and diversity and expected standards of behaviour in relation to upholding core human rights principles of fairness, respect, equality, dignity and autonomy for all.</p> <p>The Policy is designed to enable HDdUHB to consider the impact of policies, procedures and decisions on protected groups and individuals, to ensure fairness and equity in all its decisions, functions, procedures and processes, thereby aiding service improvement for protected groups and the general population. The policy will aid HDdUHB to meet the duties of the Wellbeing Future Generations (Wales) Act 2015 by contributing to evidence towards the five ways of working and the seven goals.</p> <p>This is an update of an existing policy and no complaints regarding the policy have been received in relation to equality, diversity or human rights following initial implementation. The policy has been strengthened since earlier iterations by including more details around responsibilities and the roles of different staff in contributing to a robust equality impact assessment process. No negative impacts currently identified.</p> <p>The policy is designed to influence positive behaviour and promote good practice in relation to equality issues. The aim of this policy is to provide a framework to ensure that equality and human rights principles are</p>

identified and considered in everything we do by embedding equality considerations into organisational decision-making and policy development processes. It also aims to ensure that staff and Board members are clear about their respective responsibilities in relation to undertaking and scrutinising equality impact assessments to assist with the development, planning, delivery and review of policies and practices which take into account the diverse needs of staff and service users.

The policy is expected to have an overall positive effect in improving policy drafting and implementation, decision making and service provision across the organisation.



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Bwrdd Iechyd Prifysgol
Hywel Dda
University Health Board

Equality Impact Policy and Procedure

Policy Number:	153	Supersedes:	All previous versions	Classification	Corporate
Version No	Date of EqIA:	Approved by:	Date of Approval:	Date made Active:	Review Date:
V3	April 2021	People, Organisational Development & Culture Committee (PODCC)	13/10/21	TBC	TBC

Brief Summary of Document:	The aim of this policy is to provide a framework to ensure that equality and human rights principles are identified and considered by embedding equality considerations into organisational decision-making and policy development processes. It also aims to ensure that staff and Board members are clear about their respective responsibilities in relation to undertaking and scrutinising equality impact assessments to assist with the development, planning, delivery and review of policies and practices, which take into account the diverse needs of staff and service users.
Scope:	This policy applies to each way in which HDdUHB carries out its activities in relation to both staff and service users. It will therefore cover the full range of functions, activities and decisions relating to both staff and service users. The policy applies to all staff at all levels across the UHB. Board members have a responsibility to scrutinise equality impact assessments and ensure that due regard has been given to duties under the Equality Act 2010.
To be read in conjunction with:	<ul style="list-style-type: none"> • HDdUHB Strategic Equality Plan 2020-2024 • Policy 133 - HDdUHB Equality and Diversity Policy • Equality and Human Rights Commission Guidance on Equality Impact Assessment

Owning Committee/ Group	People, Organisational Development & Culture Committee (PODCC)
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HYWEL DDA UNIVERSITY HEALTH BOARD

Executive Director:	Ros Jervis	Job Title	Director of Public Health
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Reviews and updates		
Version no:	Summary of Amendments:	Date Approved:
1	New Policy	June 2014
2	Full review CPRG - 6.9.2017 W&OD – September 2017 Staff Partnership Forum – October 2017 Improving Experience Sub Committee – October 2017 Business Planning and Performance Assurance Committee – December 2017	19/12/2017
3	Full review undertaken and updated policy presented to People, Organisational Development and Culture Committee – October 2021	13/10/21 TBC

Abbreviations used

Abbreviation	Definition
EqIA	Equality Impact Assessment
EHIA	Equality & Health Impact Assessment

Keywords	Equality, impact assessment
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1. INTRODUCTION

The Equality and Human Rights Commission state that “Impact Assessment is a process which enables an organisation to consider the effects of its decisions, policies, services on different communities, individuals or groups.”

All public sector bodies in Wales have a legal duty to undertake equality impact assessment (EqIA) as a requirement of legislation under the Equality Act 2010 and Public Sector Equality Duties (Wales) Act 2011. EqIAs provide a systematic method of ensuring that legal obligations are met and a practical means of examining new and existing policies and practices to determine what impact they may have on equality for those affected by the outcomes. The need for collection of evidence to support decisions and for consultation means that EqIA is most effectively conducted as an integral part of policy development, service planning, development and review and all key decision-making processes across all functions.

The Equality Act 2010 provides protection from unfair treatment for people in relation to their ‘protected characteristics’. These are: race/ethnicity, sex, gender reassignment, disability, sexual orientation, religion or belief, age, marriage and civil partnership and pregnancy and maternity.

The Wales Act 2017 enabled Welsh Ministers to enact Part 1, section 1 of the Equality Act 2010 – the **Socio-economic Duty** - which came into force on 31st March 2021. It requires specified public bodies (including Health Boards), when making strategic decisions such as deciding priorities and setting objectives, to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage.

Decisions of a strategic nature – the Socio-economic Duty

In general, strategic decisions will be those which affect how the relevant public body fulfils its intended statutory purpose (its functions in regards to the set of powers and duties that it uses to perform its remit) over a significant period of time and will not include routine “day to day” decisions. Examples can include, among others:

- Strategic directive and intent
- Strategies developed at Regional Partnership Boards which impact on a public body’s function
- Medium to long term plans (e.g. corporate plans, development plans, service delivery and improvement plans)
- Objective setting (e.g. Well-being Objectives, Equality Objectives, Welsh Language strategy)
- Development and review of services
- Strategic financial planning
- Major procurement and commissioning decisions
- Strategic policy development

Meeting the requirements of the Socio-economic Duty and showing how the Health Board has assessed the impact of strategic decisions on the inequalities associated with socio-economic disadvantage has been fully integrated into the equality impact assessment process.

The Human Rights Act 1998 helps to define the relationship between the citizen and the state (public sector) and how public sector organisations like the NHS are required to observe and deliver basic human values. These are reflected in HDdUHB’s organisational

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values, developed by our staff, which help us to define and develop our organisational culture. Robust equality impact assessment will assist HDdUHB in its aim to deliver high quality, person-centred services and to be an employer of choice, attracting a diverse and talented workforce who make our values a reality.

The Welsh Language (Wales) Measure 2011 is legislation that makes provision for the Welsh Language Standards. The standards establish a legal framework to impose a duty on some organisations, such as UHBs and other public bodies to comply with standards of conduct on the Welsh Language. There are 121 standards, with the four areas of compliance:

- service delivery
- policy making
- operational
- record keeping

The duties which come from the standards mean that organisations should not treat the Welsh language less favourably than the English language, together with promoting and facilitating the use of the Welsh language (making it easier for people to use in their day-to-day-life).

2. POLICY STATEMENT

Hywel Dda University Health Board is committed to ensuring that EqIA is undertaken whenever required in order to contribute to decisions about policies and services. Undertaking and EqIA will ensure that the impact on different communities, individuals or groups are fully considered and any potentially discriminatory effect may be mitigated prior to implementation.

Assessing for impact also affords the opportunity to enhance any identified potential or actual positive impacts. It is the intention of HDdUHB through robust assessing for impact to fully consider the effects that decisions, policies or services have on people under the provisions of the Equality Act 2010, Human Rights Act 1998 and Welsh Language (Wales) Measure 2011. Undertaking robust EqIA will assist HDdUHB to develop and maintain equitable policies and practices for staff and service users.

3. SCOPE

This policy applies to each way in which HDdUHB carries out its activities in relation to both staff and service users. It will therefore cover the full range of functions, activities and decisions relating to both staff and service users which can include:

- Strategies and strategic objectives
- Operational plans
- Service reviews
- Corporate objectives
- Policy development and review
- Patient Pathways
- Guidelines and protocols
- Capital bids
- Procurement and commissioning
- Budget/resource setting and allocation
- Information provided to staff, service users, carers and members of the public
- Ad hoc decisions where these may impact significantly on equality and/or human rights

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We may also need to assess the impact on protected groups locally due to the implementation of a policy when it has been developed by another authority, for example a Welsh Government national strategy. Although in most cases these decisions and policies will have been assessed for any impact by the other authority, it is important that we ensure that they are also assessed in the context of HDdUHB and the local population that we serve.

Discussions around equality impact assessment must be an integral part of the policy/decision making process from the beginning and should inform progress of the policy/decision in accordance with evidence gathered.

4. AIM

The aim of this policy is to provide a framework to ensure that equality and human rights principles are identified and considered in everything we do by embedding equality considerations into organisational decision-making and policy development processes. It also aims to ensure that staff and Board members are clear about their respective responsibilities in relation to undertaking and scrutinising EqlA to assist with the development, planning, delivery and review of policies and practices which take into account the diverse needs of staff and service users.

5. OBJECTIVES

The aims of the policy will be achieved by:

- Embedding EqlA into the reporting process for Boards, Committees and other relevant groups
- Ensuring staff understand why EqlA should be undertaken
- Ensuring staff have access to the appropriate templates and toolkits to enable high quality assessment and subsequent scrutiny to be carried out
- Ensuring Board have access to the NHS Centre for Equality and Human Rights guidance “Governance and Scrutiny – A guide for Boards” in respect of equality impact assessment
[http://www.wales.nhs.uk/sites3/documents/256/EqlA_Guide%20for%20Board%20Members%20\(English\).pdf](http://www.wales.nhs.uk/sites3/documents/256/EqlA_Guide%20for%20Board%20Members%20(English).pdf)
- Ensuring staff have access to advice and support when undertaking EqlA
- Building capacity and capability across the organisation to undertake robust equality impact assessments

6. WHAT IS EQUALITY IMPACT ASSESSMENT?

Equality Impact Assessment (EqlA) is a structured process set out in statute which requires the Health Board to consider the effects of its decisions, policies or services on different communities, individuals or groups. It is a legal requirement and is not optional. It involves:

- Anticipating or identifying the impact of our work on individuals or groups of service users/employees
- Making sure that any negative effects are eliminated or minimized
- Maximising opportunities for promoting positive effects

Equality impact assessment is crucial to improving the quality of local health services, and to meeting the needs of those using them, and the needs of our employees by ensuring that we consider the effects that our decisions, policies or services have on people on the basis of their ‘protected characteristics’.

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The Equality Act 2010 extends protection from discrimination to a person who may be **associated with** another person who has one of the protected characteristics. For example, if someone is discriminated against because they are an unpaid Carer for a disabled child or older person, then they will be able to claim disability discrimination by association. Similarly, if an employee is subjected to bullying and harassment because they are friends with a gay person, then they too are protected under the Act. These factors will therefore need to be taken into consideration when undertaking equality impact assessments.

7. WHY DO WE UNDERTAKE EQUALITY IMPACT ASSESSMENTS?

EqIAs are a good practice method of analysing what we are doing, or planning to do, using the lens of different protected groups (as defined under the Equality Act 2010) as the main focus. As well as being a **specific legal requirement**, there are a number of positive aspects of EqIAs, including:

- **Service improvement:**
 - focusing on meeting the needs of disadvantaged groups can result in improved services that benefit everyone
 - Ensuring decisions are cost-effective by facilitating effective targeting of resources to meet identified needs
- **Reducing health inequalities:**
 - helping to identify whether we are excluding different groups from any of our current or proposed policies or practices and identifying and eliminating any direct or indirect discrimination including institutional discrimination
 - assisting HDdUHB to consider policy adjustments, alternative policies or measures that might address any adverse impact
 - identifying potential improvement areas that enable staff and managers to make better informed decisions about policy, practice and service delivery
- **Creating an accessible and inclusive environment for staff and service users and building a positive reputation for HDdUHB:**
 - helping HDdUHB to make better informed decisions about policy, practice and service delivery
 - giving HDdUHB a better understanding of the needs and aspirations of our employees and the communities we serve
 - increasing opportunities to promote inclusion and build a diverse, skilled workforce

8. WHEN DO WE UNDERTAKE EQUALITY IMPACT ASSESSMENTS?

The purpose of an equality impact assessment is to ensure equality considerations are taken into account as part of the decision-making processes as well as during the development of policies and procedures. EqIA must take place **during** these processes and from the outset, which may be during the drafting of a new or revised policy, or as part of the proposal of a new project or review of service. It must not be considered as an additional task to be undertaken after the policy or service change/review project has been developed, or as a means of justifying decisions that have already been made.

Equality Impact Assessment means adopting the principles of “...evidence-based policy development, not policy-based evidence gathering.”

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9. HOW DO WE UNDERTAKE EQUALITY IMPACT ASSESSMENT?

Comprehensive Equality Impact Assessment (EqIA) and Equality & Health Impact Assessment (EHIA) guidance and templates can be found on the Equality, Diversity and Inclusion intranet page: <http://howis.wales.nhs.uk/sitesplus/862/page/43289>

Additional support and guidance for those undertaking equality impact assessments is available from the Diversity and Inclusion Team who can be contacted by emailing:

inclusion.hdd@wales.nhs.uk

9.1 General guidelines

Equality Impact Assessment involves:

- Eliminating potential for discrimination
- Anticipating or identifying the consequences of proposals on individuals or groups or service users/staff
- Ensuring that any negative impacts are eliminated or minimised as far as is practically possible
- Maximising opportunities for promoting positive effects

Any staff intending to undertake an EqIA are advised to download the appropriate toolkit and templates that can be found on the Health Board Intranet and familiarise themselves with the process beforehand.

The EqIA process should not be undertaken by one person alone and staff are advised to involve key colleagues responsible for writing / reviewing / implementing the relevant policy / procedure / guideline / service reconfiguration / financial decision in the process, along with those affected by the policy as appropriate.

The legal requirement to conduct EqIA applies the principles of relevance and proportionality. It may not be necessary to complete a full EqIA and this will be evident following the initial screening process. A full impact assessment will only be required if:

- The impact is found to be potentially discriminatory under equality or anti-discrimination legislation
- Any equality groups or communities are identified as being potentially disadvantaged or negatively impacted by the policy/ proposals
- The policy/proposal is assessed to be of high significance

If none of the above apply an EqIA screening can be undertaken which should include supporting evidence and monitoring arrangements.

10. ADOPTING A PRO-ACTIVE APPROACH TO EQUALITY IMPACT ASSESSMENT

Meeting the Public Sector Equality Duties in Wales and providing services tailored to meet the needs of our staff and communities involves a whole organisation approach. Everyone throughout the organisation is expected to be mindful of how they can contribute to creating an inclusive environment and providing equitable services, with dignity and respect.

The Health Boards values which link in with our six strategic aims link very clearly with this policy. This means all staff are obliged to adhere to the policy and will be required to complete an equality impact assessment which is evidenced when submitting a policy, process or service change for approval. Some staff members have more specific roles as described below.

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11. RESPONSIBILITIES

11.1 The Chief Executive

The Chief Executive will have overall responsibility for ensuring that all reasonable steps are taken to prevent unlawful discrimination and the promotion of equality within HDdUHB.

11.2 HDdUHB Board Members and Executive Directors

The Board will have overall responsibility for ensuring that a corporate and co-ordinated approach to equality impact assessment exists. They will influence the culture of the organisation in how they set strategic direction, review performance and ensure good governance of the organisation by ensuring that:

- A corporate and co-ordinated approach to equality impact assessment exists
- The requirements of the policy are implemented in full
- There are effective working practices in place in relation to Equality Impact Assessment and Equality Health Impact Assessment
- The effectiveness of the policy is evaluated through the receipt and consideration of regular reports directly or through appropriate delegated Committees
- Proposals and reports presented to Board are scrutinised with due regard to Public Sector Equality Duties.

11.3 The Director of Workforce and Organisational Development will be responsible for building equality considerations into employment policies and procedures and promoting a supportive environment for staff. This will include:

- Ensuring employment policies and practice that are fair and equitable
- Ensuring guidance and training which promotes equality, diversity and inclusion is available for all staff within HDdUHB
- Ensuring that information gathered in the Annual Workforce Equality Report is appropriately analysed and can provide evidence to inform equality impact assessments as appropriate.
- Ensuring mechanisms for engaging effectively with staff, including Staff Networks in order to facilitate robust feedback to inform equality impact assessments of HDdUHB policies and service developments. Engagement is key to ensuring the needs of protected groups within HDdUHB workforce and within our communities are being considered.

10.4 Clinical Directors, Consultants, Heads of Services and Managerial Staff will be responsible though their work to oversee the design, delivery, quality and effectiveness of the organisation's functions. This will include:

- Leading by example and adopting a pro-active approach to eliminating discrimination and advancing equality by promoting equality impact assessment and ensuring that it is undertaken as and when appropriate
- Ensuring that the all staff are aware of and able to access the appropriate procedures, advice and guidance in this regard
- Ensuring that staff have access to appropriate support/training to carry out their responsibilities under this policy.

10.5 The Diversity and Inclusion Team will be responsible for raising awareness and building capacity around equality impact assessment. This will include:

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- Promoting, supporting and co-ordinating the mainstreaming of equality impact assessment policy and practice across all HDdUHB functions and services
- Providing focussed advice, support and guidance to staff undertaking equality impact assessments
- Advising, assisting and providing positive support to all staff in the development and implementation of policies, procedures and working arrangements to meet the aims and objectives of this policy
- Assisting staff undertaking equality impact assessment to gain feedback from protected groups as appropriate in order to inform equality impact assessments.

10.6 Public and Patient Engagement/Patient Experience Team will be responsible for finding ways to effectively engage with patients and their carers as well as the wider population, including marginalised communities. Providing accessible mechanisms for dialogue and feedback will be essential to assist the HDdUHB to find out more about the needs of patients and staff with protected characteristics to inform equality impact assessments.

10.7 Procurement and Commissioning staff will have a responsibility to build equality impact assessment into their procedures to ensure fair and equitable procurement practices.

10.8 Trade Unions and Staff Side Representatives will support engagement with staff to facilitate feedback to inform equality impact assessments and ensure the needs of protected groups within HDdUHB staff and within our communities are being considered.

10.9 All staff

All staff undertaking or contributing to equality impact assessments must be mindful of the provisions of this policy and contribute to developing and maintaining a robust process for equality impact assessment across all functions of the HDdUHB.

All staff have responsibility and ownership of the EqIA process, including any actions that arise from the equality impact assessment. This includes managers and staff who develop new or modify existing policies, strategies, procedures etc.

With effect from the implementation of this Policy and Procedure, approval of new or amended policies, strategies and other proposals including service changes and developments, will only be given subject to the provision of relevant evidence that an equality impact assessment has been completed.

11. REFERENCES

Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
Welsh Language Measure 2011
Human Rights Act 1998
General Data Protection Regulations 2018