

Equality & Health Impact Assessment for Managing Allegations of Abuse by Staff Procedure

Part 1

Please answer all questions:-

1.	For service change, provide the title of the Project Outline Document or Business Case and Reference Number	Safeguarding and associated procedures
2.	Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details	Quality, Nursing and Allied Health Professionals Named Lead for Safeguarding Donna Newell Donna.newell@wales.nhs.uk
3.	Objectives of strategy/ policy/ plan/ procedure/ service	<p>This procedure sets out how Public Health Wales will manage allegations of abuse by staff. The overarching accountability for safeguarding children and adults at risk and promoting their welfare rests with the Board of Public Health Wales (PHW) through the Chief Executive. The identified lead Executive for the organisational arrangements is the Executive Director for Quality, Nursing and AHP's. It is therefore essential that Public Health Wales has appropriate Safeguarding Policies and Procedures in place to ensure Public Health Wales is fulfilling its Safeguarding obligations.</p> <p>It will provide an assurance that the organisation is compliant with the Social Services and Well-being (Wales) Act 2014. This strategy fits into the Public Health Wales strategic priorities 1, 4 and 6.</p>

<p>4. Evidence and background information considered. For example</p> <ul style="list-style-type: none"> • population data • staff and service users data, as applicable • needs assessment • engagement and involvement findings • research • good practice guidelines • participant knowledge • list of stakeholders and how stakeholders have engaged in the development stages • comments from those involved in the designing and development stages <p>Population pyramids are available from Public Health Wales Observatory and the 'Shaping Our Future Wellbeing' Strategy provides an overview of health need.</p>	<p>Staff data</p> <p>The numbers of staff affected by disciplinary action within the last year is small, and therefore it is not possible to draw comparisons with organisational data related to protected characteristics.</p> <p>The Social Services and Well-being (Wales) Act 2014 and Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 place legislative duties on Public Health Wales. Public Health Wales is committed to raising awareness and providing guidance for employees and managers to protect those who are vulnerable in our society and address the effects of all types of domestic abuse and intimate and sexual violence. Good Practice Guidelines A range of other organisational policies and EHIA's as well as relevant case law has been reviewed to look at good practice and to understand the impact that Safeguarding procedures may have on particular groups of people. The All Wales Safeguarding Procedures have been a key documents in informing the content of the Procedure.</p> <p>Engagement In preparing this policy, consultation has taken place through the relevant consultation process of Public Health Wales</p>
<p>5. Who will be affected by the strategy/ policy/ plan/ procedure/ service</p> <p>Consider staff as well as the population that the project/change may affect to different degrees.</p>	<p>Any staff member, volunteer, those on honorary contracts, Secondees, students, those employed through agency or on a contract for services basis. Management via this policy will also impact on wider society</p>

Part 2- Equality and Welsh language

6. EQIA / How will the strategy, policy, plan, procedure and/or service impact on people?

Questions in this section relate to the impact on people on the basis of their 'protected characteristics'.

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps	Action taken by Directorate. Make reference to where the mitigation is included in the document, as appropriate This column is to be updated in future reviews	Recommendations for improvement/ mitigation/ identified gaps or opportunities
6.1 Age For most purposes, the main categories are: <ul style="list-style-type: none"> • under 18; • between 18 and 65; and • over 65 	Acknowledgement that safeguarding has particular impact for children and older adults. Staff can become over sensitive or desensitised to a safeguarding issue (where policy = compliance).The needs of vulnerable adults will need to be highlighted Physical environment needs for children and vulnerable adults to be	All staff are treated fairly and consistently in the application of this procedure. Training on the procedure and awareness raising of how this may impact on services, work, colleagues would be valuable to highlight the responsibility of all those associated with Public Health Wales and to manage these considerations in a	N/A

	considered more e.g. when designing services	supportive, professional way	
<p>6.2 Persons with a disability as defined in the Equality Act 2010</p> <p>Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes</p>	There may be a negative impact on those with disabilities in relation to accessing meetings on sites, also due to the nature of the issues associated with safeguarding we need to consider the psychological impact on those affected/involved	Line managers to ensure situations are handled sensitively, reasonable adjustments, and appropriate support is provided to those affected or involved, in discussion with the individuals	
<p>6.3 People of different genders:</p> <p>Consider men, women, people undergoing gender reassignment</p> <p>NB Gender-reassignment is anyone who proposes to, starts, is going through or who has completed a process to change his or her gender with or without going through any medical procedures. Sometimes referred to as Trans or Transgender</p>	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	

<p>6.4 People who are married or who have a civil partner.</p>	<p>No positive or negative impact</p>	<p>All staff are treated fairly and consistently in the application of these guidelines</p>	
<p>6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.</p>	<p>No positive or negative impact</p>	<p>All staff are treated fairly and consistently in the application of this procedure</p>	
<p>6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers</p>	<p>There is the potential for misunderstanding of the policy and procedure by staff for whom English is an additional language.</p>	<p>All staff are treated fairly and consistently in the application of these guidelines Cultural and language awareness issues may need to be recognised and addressed</p>	
<p>6.7 People with a religion or belief or with no religion or belief. The term 'religion' includes a religious or philosophical belief</p>	<p>No positive or negative impact</p>	<p>All staff are treated fairly and consistently in the application of this Procedure</p>	
<p>6.8 People who are attracted to other people of:</p> <ul style="list-style-type: none"> • the opposite sex (heterosexual); 	<p>No positive or negative impact</p>	<p>All staff are treated fairly and consistently in the application of this Procedure</p>	

<ul style="list-style-type: none"> • the same sex (lesbian or gay); • both sexes (bisexual) 			
<p>6.9 People according to their income related group: Consider people on low income, economically inactive, unemployed/workless, people who are unable to work due to ill-health</p>	No positive or negative impact	All staff are treated fairly and consistently in the application of this Procedure	
<p>6.10 People according to where they live: Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities</p>	No positive or negative impact	All staff are treated fairly and consistently in the application of this Procedure	
<p>6.11 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service</p>	No positive or negative impact	All staff are treated fairly and consistently in the application of this Procedure	
<p>6.12 Welsh Language</p>			
<p>There are 2 key considerations to be made during the development of a policy, project, programme, service to ensure there are no adverse effects and/or a positive or increased positive effect on: (please note these will continue to be reviewed to ensure Public Health Wales fulfils their duties to comply with one or more standards outlined within the Welsh Language Standards (No 7) Regulations 2018)</p>			

Opportunities for persons to use the Welsh language	The Named Lead for Safeguarding is a Welsh speaker; therefore staff can access advice and support relating to this procedure through the medium of Welsh.	None	
Treating the Welsh language no less favourably than the English language			

Part 3 – Health

Questions in this section relate to the impact on the health and wellbeing outcomes of the population **and** specific population groups who could be more impacted than others by a policy/project/proposal.

The part of the assessment identifies;

- which specific groups in the population could be impacted more (inequalities)
- what those potential impacts could be across the wider determinants of health framework?
- Potential gaps, opportunities to maximise positive H&WB outcomes
- Recommendations/mitigation to be considered by the decision makers

7. Identification of specific population groups

Use the WHIASU Population Groups checklist as a reference to identify the population groups who could be more impacted than others by a policy/project/proposal. The check list can be found on the PHW Integrated EqHIA guidance pages (requires link to PHW Intranet pages for additional information and resources)

The groups listed have been identified as more susceptible to poorer health and wellbeing outcomes (health inequalities) and therefore it is important to consider them in a HIA assessment. In a HIA, the groups identified, as

more sensitive to potential impacts will depend on the characteristics of the local population, the context, and the nature of the proposal itself.

7.1 Groups identified	Rational/explanation
No groups identified.	

Assessment

Complete the wider determinants framework table below providing rational/evidence where appropriate:

1. Consider how the proposal could impact on the population and specific population groups identified above (positive/negative) for each of the wider determinants (the bullets under each determinant are there as a guide)
2. Record any unintended consequences (negative impacts) and/or gaps identified
3. Record any positive impacts or missed opportunities to maximise positive health and wellbeing outcomes
4. identify and record mitigation/recommendations where appropriate

Please note you may find that not all determinants are relevant to the project/plan however recording N/A is not acceptable a rational or evidence should be explained/referenced

Wider determinant for consideration	Positive impacts or additional opportunities	Unintended consequences or gaps	Population groups affected	Mitigation/recommendations
7.2 Lifestyles <ul style="list-style-type: none"> • Diet/nutrition/breastfeeding • Physical activity • Use of alcohol, cigarettes, e-cigarettes • Use of substances, non-prescribed drugs, abuse of prescription medication • Social media use • Sexual activity • Risk-taking activity i.e. gambling, addictive behaviour 	There is no specific evidence to suggest the procedure has any impact on people in terms of lifestyles.			

<p>7.3 Social and community influences on health</p> <ul style="list-style-type: none"> • Adverse childhood experiences • Citizen power and influence • Community cohesion, identity, local pride • Community resilience • Domestic violence • Family relationships • Language, cultural and spirituality • Neighbourliness • Social exclusion i.e. homelessness • Parenting and infant attachment • Peer pressure • Racism • Sense of belonging • Social isolation/loneliness • Social capital/support/networks • Third sector & volunteering 	<p>Individuals subject to this procedure may have experience of Adverse Childhood Experiences, Domestic abuse or poor parenting.</p>	<p>These experiences could impact on their life, resulting in the need for the Safeguarding Policy and procedure to be initiated.</p>	<p>No specific population groups</p>	<p>Line managers to ensure situations are handled sensitively, reasonable adjustments, and appropriate support is provided to those affected or involved, in discussion with the individuals.</p>
<p>7.4 Mental Wellbeing</p> <ul style="list-style-type: none"> • Does this proposal support sense of control? • Does it enable participation in community and economic life? • Does it impact on emotional wellbeing and resilience? 	<p>Staff involved in this procedure may suffer with a negative impact in their emotional wellbeing and resilience.</p>		<p>No specific population groups</p>	<p>Line managers to ensure situations are handled sensitively, reasonable adjustments, and appropriate support is provided to those affected or involved, in discussion with the individuals.</p>
<p>7.5 Living/ environmental conditions affecting health</p> <ul style="list-style-type: none"> • Air quality • Attractiveness/access/availability/quality of area, green and blue space, natural space. • Health & safety, community, individual, public/private space • Housing, quality/tenure/indoor environment • Light/noise/odours, pollution 	<p>N/A</p>			

<ul style="list-style-type: none"> • Quality & safety of play areas (formal/informal) • Road safety • Urban/rural built & natural environment • Waste and recycling • Water quality 				
<p>7.6 Economic conditions affecting health</p> <ul style="list-style-type: none"> • Unemployment • Income, poverty (incl. food and fuel) • Economic inactivity • Personal and household debt • Type of employment i.e. permanent/temp, full/part time • Workplace conditions i.e. environment culture, H&S 	If disciplinary action leads to dismissal, this will impact on those people who are dismissed in terms of their income and employment status.	This will have an impact on unemployment, income, household debt.	No specific groups.	In the cases that have been known in PHW. To date there have not been any dismissals relating to initiating this procedure. In the last year there have not been 0 cases.
<p>7.7 Access and quality of services</p> <ul style="list-style-type: none"> • Careers advice • Education and training • Information technology, internet access, digital services • Leisure services • Medical and health services • Other caring services i.e. social care; Third Sector, youth services, child care • Public amenities i.e. village halls, libraries, community hub • Shops and commercial services • Transport including parking, public transport, active travel 	NA			
<p>7.8 Macro-economic, environmental and sustainability factors</p> <ul style="list-style-type: none"> • Biodiversity • Climate change/carbon reduction/flooding/heatwave • Cost of living i.e. food, rent, transport and house prices • Economic development including trade 	NA			

<ul style="list-style-type: none"> • Government policies i.e. Sustainable Development principle (integration; collaboration; involvement; long term thinking; and prevention) • Gross Domestic Product • Regeneration 				
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Stage 3

Summary of key findings and actions Please answer question 8.1 following the completion of the EHIA and complete the action plan

Key findings: Impacts/gaps/opportunities	Actions (what is needed and who needs to do) to address the identified mitigation and recommendations	Lead		
<p>The procedure may have an impact on disabled people and those people for whom English is an additional language. The policy aims to address any potentially disproportionate impact through providing additional explanation, support or translation services, and the consideration of reasonable adjustments to the process where these could mitigate the effects of any substantial disadvantage. If disciplinary action leads to dismissal, this will impact on those people</p>	<p>Apply the policy fairly and consistently. Provide support and guidance to managers and staff. Monitor the protected characteristics of staff affected, including dismissal, to identify any disproportionate impact on particular groups of people.</p>	<p>People and Organisational Development</p>		

who are dismissed in terms of their income and employment status.				
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Alternatively, if appropriate, please explain the steps taken to consult with and consider the differential impact of the changes on the various protected characteristic groups (part 2) or any specific identified population groups (part 3).