

## Equality & Health Impact Assessment for

### Supporting Learning and Development Policy and Process

Please read the Guidance Notes in Appendix 1 prior to commencing this Assessment

**Please note:**

- The completed Equality & Health Impact Assessment (EHIA) must be
  - Included as an appendix with the cover report when the strategy, policy, plan, procedure and/or service change is submitted for approval
  - Published on the UHB intranet and internet pages as part of the consultation (if applicable) and once agreed.
- Formal consultation must be undertaken, as required
- Appendices 1-3 must be deleted prior to submission for approval

Please answer all questions:-

1.	For service change, provide the title of the Project Outline Document or Business Case and Reference Number	N/A
2.	Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details	People and Organisational Development Lisa Whiteman – Organisational Development Manager 02920 104255
3.	Objectives of strategy/ policy/ plan/ procedure/ service	All staff working in Public Health Wales have a consistent and structured approach to accessing time (with or without funding) for development activity.

<p><b>4.</b></p>	<p>Evidence and background information considered. For example</p> <ul style="list-style-type: none"> <li>• population data</li> <li>• staff and service users data, as applicable</li> <li>• needs assessment</li> <li>• engagement and involvement findings</li> <li>• research</li> <li>• good practice guidelines</li> <li>• participant knowledge</li> <li>• list of stakeholders and how stakeholders have engaged in the development stages</li> <li>• comments from those involved in the designing and development stages</li> </ul> <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 All-Wales L&amp;D Managers Group input Staff Survey 2016 Current policies Staff Networks (Women, Carers, Single Parents and LGBT)</p>
<p><b>5.</b></p>	<p>Who will be affected by the strategy/ policy/ plan/ procedure/ service</p>	<p>All staff in Public Health Wales who request and receive support (time off and/or funding) to undertake learning and development</p>

**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'. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

<p><b>How will the strategy, policy, plan, procedure and/or service impact on:-</b></p>	<p><b>Potential positive and/or negative impacts</b></p>	<p><b>Recommendations for improvement/ mitigation</b></p>	<p><b>Action taken by Clinical Board / Corporate Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate</p>
<p><b>6.1 Age</b> For most purposes, the main categories are:</p> <ul style="list-style-type: none"> <li>• under 18;</li> <li>• between 18 and 65; and</li> <li>• over 65</li> </ul>	<p>There should be no positive or negative impact on any specific age groups as the policy will be applied consistently to all staff and each case reviewed and assessed on its own merit.</p> <p>Trade Union partners raised a concern that colleagues nearing retirement who access funded learning may be put off from applying (and as a result become de-skilled) or may be more likely to be affected by monies being recovered if they retire within a given timescales.</p>	<p>The policy (pre-approval) will be amended to reflect the need for Assistant Director of Organisational Development and Assistant Director of Finance input prior to pursuing recovery.</p> <p>However, all managers should consider the relevance of and how essential learning is for an individual or group to be able to carry out their responsibilities and balance the organisation’s ability to receive a return on investment.</p>	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
<p><b>6.2 Persons with a disability as defined in the Equality Act 2010</b> Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes</p>	<p>There should not be any positive or negative impact on persons with a disability, however managers should give fair consideration to any additional time or funding needed to participate in (including travel to and from) any learning event.</p> <p>16% of part time staff in Public Health Wales have disclosed a disability (the number of those with agreed flexible full time working patterns is unknown).</p>	<p>Reasonable or tailored adjustments should be considered by the manager (with support from the People and Organisational Development team where needed) in line with normal practise. Individuals should not unreasonably be refused time off or financial support for learning on the basis of a reasonable adjustment being required.</p> <p>Managers should consider accessible learning options when discussing development with all staff. Whilst not responsible for offerings outside of the organisation, learning events run within PHW should, as far as is practicable, take into account varying working patterns.</p>	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
<p><b>6.3 People of different genders:</b> Consider men, women, people undergoing gender reassignment</p> <p><b>NB</b> 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>	<p>There should be no positive or negative impact on any gender or person undergoing gender reassignment.</p> <p>However, 91% of part time staff in Public Health Wales are female which may make access to courses and learning more challenging than for full time staff.</p>	<p>Managers should consider accessible learning options when discussing development with all staff. Whilst not responsible for offerings outside of the organisation, learning events run within PHW should, as far as is practicable, take into account varying working patterns.</p>	
<p><b>6.4 People who are married or who have a civil partner.</b></p>	<p>There should be no positive or negative impact on anyone who is married or has a civil partner</p>		
<p><b>6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.</b> They are protected for 26 weeks after having a baby whether or not they are on maternity leave.</p>	<p>Colleagues currently on maternity or other parental leave may not be aware of courses/development opportunities that may require registration during their leave period and/or could be accessed using KIT days.</p>	<p>Managers within PHW should ensure all staff on maternity/other parental leave receive notification of relevant courses in line with agreed development plans and broader communication agreements.</p>	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
<b>6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers</b>	There should be no positive or negative impact on anyone on the basis of nationality, race, colour, culture or ethnic origin.		
<b>6.7 People with a religion or belief or with no religion or belief.</b> The term ‘religion’ includes a religious or philosophical belief	There should be no positive or negative impact on anyone on the basis of religious belief/no religious belief.  Colleagues observing Ramadan may wish to defer learning/development activities until after the fasting period if this suits their requirements.	Managers and the wider organisation should not unreasonably refuse the deferral of learning neither should anyone deferring learning experience any detriment e.g. during appraisals or interviews/assessments.	
<b>6.8 People who are attracted to other people of:</b> <ul style="list-style-type: none"> <li>• the opposite sex (heterosexual);</li> <li>• the same sex (lesbian or gay);</li> <li>• both sexes (bisexual)</li> </ul>	There should be no positive or negative impact on anyone on the basis of sexual attraction or orientation.		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
<p><b>6.9 People who communicate using the Welsh language in terms of correspondence, information leaflets, or service plans and design</b></p> <p>Well-being Goal – A Wales of vibrant culture and thriving Welsh language</p>	<p>The policy, guidance and toolkits are available in English only.</p>	<p>Update the policy with any further guidance/direction as set out by the Welsh Language Commissioner.</p> <p>Produce policy and associated documents into Welsh in line with organisational plans.</p>	
<p><b>6.10 People according to their income related group:</b> Consider people on low income, economically inactive, unemployed/workless, people who are unable to work due to ill-health</p>	<p>There should be no positive or negative impact on anyone in any income related group.</p> <p>Questions have been raised over the ability of lower-income colleagues being able to pay back funding should they leave the organisation. However, assumptions about disposable income/ability to pay costs should</p>	<p>Cases for recovery of costs will be handled on an individual basis and approved by both the Assistant Director of OD and the Assistant Director of Finance.</p> <p>There is currently no process or system to support the analysis or reporting of learning and development</p>	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
	not be made based on salary alone.	requests by band/salary group.	
<p><b>6.11 People according to where they live:</b> Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities</p>	<p>There should be no positive or negative impact on anyone according to where they live. As much as is possible, courses arranged/commissioned corporately are run across Wales.</p> <p>Some colleagues may require additional time off for travel and this shouldn't lead to applications being refused. The vast majority of corporately-run courses take place in PHW sites.</p>		
<p><b>6.12 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service</b></p>	None		

**7. HIA / How will the strategy, policy, plan, procedure and/or service impact on the health and well-being of our population and help address inequalities in health?**

Questions in this section relate to the impact on the overall health of individual people and on the impact on our population. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts and any particular groups affected</b>	<b>Recommendations for improvement/ mitigation</b>	<b>Action taken by Clinical Board / Corporate Directorate</b> Make reference to where the mitigation is included in the document, as appropriate
<p><b>7.1 People being able to access the service offered:</b>                      Consider access for those living in areas of deprivation and/or those experiencing health inequalities</p> <p>Well-being Goal - A more equal Wales</p>	<p>There should be no positive or negative impact on anyone experiencing health inequalities</p>		
<p><b>7.2 People being able to improve /maintain healthy lifestyles:</b>                      Consider the impact on healthy lifestyles, including healthy eating, being active, no smoking /smoking cessation, reducing the harm caused by alcohol and /or non-prescribed drugs plus access to services that support disease</p>	<p>There should be a positive impact on those able to more easily and fairly access development</p>		

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts and any particular groups affected</b>	<b>Recommendations for improvement/ mitigation</b>	<b>Action taken by Clinical Board / Corporate Directorate</b> Make reference to where the mitigation is included in the document, as appropriate
<p>prevention (eg immunisation and vaccination, falls prevention).            Also consider impact on access to supportive services including smoking cessation services, weight management services etc</p> <p>Well-being Goal – A healthier Wales</p>			
<p><b>7.3 People in terms of their income and employment status:</b>            Consider the impact on the availability and accessibility of work, paid/ unpaid employment, wage levels, job security, working conditions</p> <p>Well-being Goal – A prosperous Wales</p>	<p>There should be no positive or negative impact on anyone in terms of their employment status</p>		
<p><b>7.4 People in terms of their use of the physical environment:</b></p>	<p>There should be no positive or negative impact on anyone in</p>		

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts and any particular groups affected</b>	<b>Recommendations for improvement/ mitigation</b>	<b>Action taken by Clinical Board / Corporate Directorate</b> Make reference to where the mitigation is included in the document, as appropriate
<p>Consider the impact on the availability and accessibility of transport, healthy food, leisure activities, green spaces; of the design of the built environment on the physical and mental health of patients, staff and visitors; on air quality, exposure to pollutants; safety of neighbourhoods, exposure to crime; road safety and preventing injuries/accidents; quality and safety of play areas and open spaces</p> <p>Well-being Goal – A resilient Wales</p>	<p>terms of their physical environment.</p> <p>Where catering is included (should events be run off-site), healthy options are selected in line with organisational expectations.</p>		
<p><b>7.5 People in terms of social and community influences on their health:</b></p> <p>Consider the impact on family organisation and roles; social support and social networks; neighbourliness and sense of belonging; social isolation; peer</p>	<p>See impact analysis on part-time workers.</p> <p>Face to face learning and the opportunity to engage via Skype should help reduce workplace isolation and provides further</p>		

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts and any particular groups affected</b>	<b>Recommendations for improvement/ mitigation</b>	<b>Action taken by Clinical Board / Corporate Directorate</b> Make reference to where the mitigation is included in the document, as appropriate
pressure; community identity; cultural and spiritual ethos  Well-being Goal – A Wales of cohesive communities	opportunity to meet colleagues from other sites/departments.		
<b>7.6 People in terms of macro-economic, environmental and sustainability factors:</b> Consider the impact of government policies; gross domestic product; economic development; biological diversity; climate  Well-being Goal – A globally responsible Wales	Where possible, learning events are run on PHW sites to avoid the need for additional travel.		

**Please answer question 8.1 following the completion of the EHIA and complete the action plan**

<p><b>8.1 Please summarise the potential positive and/or negative impacts of the strategy, policy, plan or service</b></p>	<p>The revised policy and process empowers managers and staff to make easier decisions on learning and development opportunities. Recording time out for learning over 0.5 days will give the organisation richer data from which to assess accessibility and help the business evaluate and measure return on investment.</p> <p>A number of potential negatives have been raised in both the accessibility of learning opportunities for part time colleagues (the vast majority of whom are female) and the ability of colleagues to repay costs should they leave the organisation.</p> <p>The organisation is not responsible for the accessibility of external learning, however has and does commit to offering opportunities in various locations that meet varying working patterns as far as is practicable. Development meeting individual's needs benefits the individual themselves as well as the organisation and colleagues should also be committed to making any adjustments as far as is reasonable (i.e. being prepared to travel, adjusting working hours where possible).</p> <p>The right to recover funding in the event an employee leaves an organisation is common in learning and development policies. With limited budgets to support staff development, organisations retain the right to recover funding whereby they do not have the opportunity to achieve return on investment; this not only ensures a more robust business case is made in the application stage, but can offer some assurance to stakeholders that public monies used for development are, to a degree, protected.</p> <p>The decision to recover costs from an individual leaving the organisation after receiving funding for learning will be made jointly by the Assistant Directors of Organisational Development and Finance and each case will be assessed on its own</p>
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	merit. The reason for leaving will be taken into account but will not be the only factor considered.
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### Action Plan for Mitigation / Improvement and Implementation

	Action	Lead	Timescale	Action taken by Clinical Board / Corporate Directorate
<b>8.2 What are the key actions identified as a result of completing the EHIA?</b>	Monitoring learning and development records in ESR	LW	Ongoing from April 2019	
	Assess the feasibility of a reporting mechanism to capture protected characteristics against learning records	JoB	2019/2020	
<b>8.3 Is a more comprehensive Equalities Impact Assessment or Health Impact Assessment required?</b>  This means thinking about relevance and proportionality to the Equality Act and asking: is the impact significant enough that a more formal and full consultation is required?	No			

	Action	Lead	Timescale	Action taken by Clinical Board / Corporate Directorate
<p><b>8.4 What are the next steps?</b></p> <p>Some suggestions:-</p> <ul style="list-style-type: none"> <li>• Decide whether the strategy, policy, plan, procedure and/or service proposal: <ul style="list-style-type: none"> <li>○ continues unchanged as there are no significant negative impacts</li> <li>○ adjusts to account for the negative impacts</li> <li>○ continues despite potential for adverse impact or missed opportunities to advance equality (set out the justifications for doing so)</li> <li>○ stops.</li> </ul> </li> <li>• Have your strategy, policy, plan, procedure and/or service proposal approved</li> <li>• Publish your report of this impact assessment</li> <li>• Monitor and review</li> </ul>	Publish alongside policy and process	LW/LD	End of November 2018	