

## Equality & Health Impact Assessment for Putting Things Right – Handling Concerns Policy

**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<sup>1</sup>
- Appendices 1-3 must be deleted prior to submission for approval

Please answer all questions:-

<b>1.</b>	For service change, provide the title of the Project Outline Document or Business Case and Reference Number	Putting Things Right – Handling Concerns Policy
<b>2.</b>	Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details	Quality, Nursing and Allied Health Professionals Directorate Sian Bolton, Action Executive Director of Quality, Nursing and Allied Health Professionals. Sian.bolton@wales.nhs.uk
<b>3.</b>	Objectives of strategy/ policy/ plan/ procedure/ service	<ul style="list-style-type: none"> <li>• To ensure that concerns raised with Public Health Wales are dealt with in a proactive and timely manner;</li> <li>• To ensure that there are appropriate structures in place to</li> </ul>

		<p>facilitate the concerns management process;</p> <ul style="list-style-type: none"> <li>To ensure that lessons are learned from concerns to facilitate continuous improvement in standards of services.</li> </ul>
<b>4.</b>	<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<sup>2</sup> and the UHB's 'Shaping Our Future Wellbeing' Strategy provides an overview of health need<sup>3</sup>.</p>	<p>An Equality Impact Assessment was undertaken in 2012 and was used as a reference point in undertaking this assessment.</p> <p>There are no specific equalities data available in relation to staff and service users.</p> <p><i>The NHS Centre for Equality and Human Rights toolkit for carrying out Equality Impact Assessment</i> good practice guidelines was also considered when undertaking this assessment.</p> <p>The policy and procedure defines the internal processes in place to ensure that concerns are dealt with in an equitable and timely manner. The Equality Impact Assessment has identified some actions to mitigate any negative effects.</p>
<b>5.</b>	<p>Who will be affected by the strategy/ policy/ plan/ procedure/ service</p>	<p>This policy is intended to be an internal facing policy which sets out the roles and responsibilities of individual members of staff and the reporting structures in place to facilitate the concerns management process. It has the potential to impact on staff who are involved in</p>

<sup>2</sup> <http://nww2.nphs.wales.nhs.uk:8080/PubHObservatoryProjDocs.nsf>

<sup>3</sup> <http://www.cardiffandvaleuhb.wales.nhs.uk/the-challenges-we-face>

		the investigation process, but may also impact on service users who pursue a concern with Public Health Wales.
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## 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.

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts</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
<b>6.1 Age</b> For most purposes, the main categories are: <ul style="list-style-type: none"> <li>• under 18;</li> <li>• between 18 and 65; and</li> <li>• over 65</li> </ul>	This policy does not have an impact on people because of their age. Each concern is assessed on its own merits in accordance with Putting Things Right Handling Concerns Regulations, regardless of gender.	None required.	
<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	This policy is predominantly intended to be an internal facing document. There is potential however for service users to request copies.  The policy is not routinely	Large print, Braille or audio versions could be provided on request.  The Welsh Government provide 'Putting things Right' leaflets in various formats, including a	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts</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
diabetes	<p>produced in alternative formats such as Braille.</p> <p>The policy may not be understood by those who have difficulty deciphering or reading the written word, for example, dyslexia.</p>	<p>British sign language version</p> <p>Further explanations and support to understand the policy will be provided as required.</p>	
<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</p>	<p>This policy does not have any negative or positive effects on people of different genders.</p> <p>Each concern s assessed on the basis of facts and in accordance with the law. Public Health Wales has a legal obligation to provide all information it holds relating to the concern in accordance with the Putting Things</p>	<p>None required.</p>	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts</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
procedures. Sometimes referred to as Trans or Transgender	Right Regulations.		
<b>6.4 People who are married or who have a civil partner.</b>	See 6.3 above	None required.	
<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.	See 6.3 above.	None required.	
<b>6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers,</b>	Each concern is assessed on the basis of facts and in accordance with the Putting Things Right Regulations and the law. Discrimination to people of a different race,	Public Health Wales can explore the option of using an interpretation service.	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts</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
<b>migrant workers</b>	nationality, colour, culture or ethnic origin is unlikely to occur.  There may however be a negative impact for individuals who do not understand written English or for whom English is not their first language.	The negative impact could be mitigated via the use of plain English. The policy can be explained to individuals who are able to understand English.	
<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	See 6.3 above.	None required.	
<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>	See 6.3 above.	None required.	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts</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>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>Negative – existing policies are not routinely translated into Welsh.</p> <p>Welsh speakers who wish to pursue a concern through the medium of Welsh will be supported in doing so.</p>	<p>Consideration should be given to publishing this policy in Welsh.</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>Low value Redress claims (below £25,000), can be pursued via the 'Putting things Right' route.</p> <p>Individuals who pursue this avenue as a form of redress will be entitled to free legal advice, where a qualifying liability in law exists. Public Health Wales can explain the</p>	<p>None required.</p>	



<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts</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>process to individuals and support them to pursue this route.</p> <p>Public Health Wales also advises every service user, who raises a concern, of their right to access independent and free advocacy and support services e.g. Community Health Council.</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	See 6.10 above	None required.	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts</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
<b>6.12 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service</b>	None identified.	None required.	

**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
<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  Well-being Goal - A more equal Wales	This policy is an administrative document which has no direct impact on the health of the population, the addressing of inequalities in health or the delivery of services.  Please refer to section 6.10		
<b>7.2 People being able to improve /maintain healthy lifestyles:</b> Consider the impact on healthy lifestyles, including	This policy does not have an impact in this area.	None	

<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>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 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>			
<b>7.3 People in terms of their income and employment status:</b> Consider the impact on the availability and	This policy does not have an impact in the area (although please refer to Section 6.10)	None	

<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
accessibility of work, paid/unpaid employment, wage levels, job security, working conditions Well-being Goal – A prosperous Wales			
<b>7.4 People in terms of their use of the physical environment:</b> 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	This policy does not have an impact in this area.	None	

<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
and safety of play areas and open spaces  Well-being Goal – A resilient Wales			
<b>7.5 People in terms of social and community influences on their health:</b> Consider the impact on family organisation and roles; social support and social networks; neighbourliness and sense of belonging; social isolation; peer pressure; community identity; cultural and spiritual ethos  Well-being Goal – A Wales of cohesive communities	This policy does not have an impact in this area.	None	
<b>7.6 People in terms of</b>	This policy does not have	None	

<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>macro-economic, environmental and sustainability factors:</b>            Consider the impact of government policies; gross domestic product; economic development; biological diversity; climate</p> <p>Well-being Goal – A globally responsible Wales</p>	<p>an impact in this area.</p>		

**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>This policy is predominantly intended as an internal facing policy which describes the staff responsibilities and the organisational structures needed to support the concerns management process.</p> <p>The policy is intended to make the concerns management process as quick and as fair as possible, with concerns being assessed on the basis of facts and in accordance with the Regulations. It is therefore felt that the impact is largely positive. The positive effect is enhanced with the PTR leaflets aimed at service users and explains the process in plain English.</p>
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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>	<p>Explore the option of producing a separate document on the concerns management process which is specifically aimed at Service Users.</p> <p>Consider the implications of the Welsh Language Standards on this policy</p>	Governance and General Manager / Claims Manager		

	<b>Action</b>	<b>Lead</b>	<b>Timescale</b>	<b>Action taken by Clinical Board / Corporate Directorate</b>
<p><b>8.3 Is a more comprehensive Equalities Impact Assessment or Health Impact Assessment required?</b></p> <p>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?</p>	<p>No – the impact of the policy is <b>positive</b>.</p>	--	--	

	<b>Action</b>	<b>Lead</b>	<b>Timescale</b>	<b>Action taken by Clinical Board / Corporate Directorate</b>
<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> </ul>	<p>Following consultation with Executive Team, present the policy to the Public Health Wales Quality, Safety and Improvement Committee for approval.</p> <p>Publish updated version of the policy on the website.</p> <p>Provide the link to the PTR leaflet which has been translated into a number of languages.</p>	<p>Executive Director of Quality, Nursing &amp; Allied Health Professionals</p> <p>Governance and General Manager</p> <p>Governance and General Manager</p>	<p>July 2018</p> <p>July 2018</p> <p>July 2018</p>	

	<b>Action</b>	<b>Lead</b>	<b>Timescale</b>	<b>Action taken by Clinical Board / Corporate Directorate</b>
<ul style="list-style-type: none"> <li>• Have your strategy, policy, plan, procedure and/or service proposal approved.</li> <li>• Publish your report of this impact assessment</li> </ul> <p>Monitor and review</p>	<p>Monitor and review compliance with policy using the KPIs set out within the policy and report to the Executive Team and Quality, Safety and Improvement Committee</p>	<p>Governance and General Manager</p>	<p>Quarterly</p>	