

Equality & Health Impact Assessment for

Public Health Wales Research Misconduct Policy and 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	Public Health Wales Research Misconduct Policy and Procedure
2.	Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details	Research Data and Digital Directorate Elen de Lacy – Research Development and Strategy Lead Email: elen.delacy@wales.nhs.uk
3.	Objectives of strategy/ policy/ plan/ procedure/ service	The procedure defines research misconduct and sets out the process for reporting, recording, investigating and responding to allegations concerning any present or past member of staff in relation to research undertaken while employed by Public Health Wales. It supports a fair, proportionate and consistent approach that protects research participants, staff, and the integrity of the research environment.
4.	Evidence and background information considered. For example • population data • staff and service users data, as applicable • needs assessment • engagement and involvement findings	This Equality and Health Impact Assessment has been updated to reflect the reviewed version of the Public Health Wales Research Misconduct Policy and Procedure and the wider strengthening of organisational arrangements for research integrity. The procedure should be read alongside the Research Misconduct Policy, the UK Policy Framework for Health and Social Care Research, the All Wales Raising Concerns (Whistleblowing) Policy, the PHW Respect

	• 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 Population pyramids are available from Public Health Wales Observatory and the 'Shaping Our Future Wellbeing' Strategy provides an overview of health need.	and Resolution Policy, the PHW Counter Fraud, Bribery and Corruption Policy and Procedure, and the Concordat to Support Research Integrity. The revised procedure also reflects updated guidance and policy references, including the UK Research Integrity Office detailed template procedure for investigating breaches of research integrity, the UKRIO Code of Practice for Research, Wellcome guidance on good research practice, and UKRI guidance on good research practice. The review incorporates clearer wording on staff wellbeing and culture, data protection, DATIX reporting requirements, relevant organisational leads, and the role of regulatory bodies where concerns arise. The policy and procedure have also been considered through discussion with relevant internal stakeholders and through review by PHW Research Evaluation and Strategic Oversight Group (RESOG).
5.	Who will be affected by the strategy/ policy/ plan/ procedure/ service Consider staff as well as the population that the project/change may affect to different degrees.	The procedure applies to Public Health Wales staff involved in research and to those responsible for receiving, recording and investigating concerns about research misconduct. It supports a transparent and consistent approach to managing allegations, helps protect participants, staff and the organisation, and reinforces a positive research culture based on integrity, accountability and learning. By strengthening arrangements for reporting, oversight and investigation, the procedure also helps Public Health Wales meet its responsibilities under the UK Policy Framework for Health and Social Care Research.

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: • under 18; • between 18 and 65; and • over 65	The policy and procedure will not have a direct impact on service provision and do not target any particular age group.	No specific action required.	No mitigation required.
6.2 Persons with a disability as defined in the Equality Act 2010 Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term	The policy and procedure will have no prejudicial impact upon persons with a disability as defined in the Equality Act 2010.	No specific action required.	No mitigation required.

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
medical conditions such as diabetes			
6.3 People of different genders: Consider men, women, people undergoing gender reassignment 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	The policy and procedure will have no impact upon people on the basis of gender, gender identity or gender reassignment.	No specific action required.	No mitigation required.
6.4 People who are married or who have a civil partner.	The policy and procedure will have no impact upon people on the basis of	No specific action required.	No mitigation required.

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
	marital or civil partnership status.		
6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.	The policy and procedure will have no impact upon women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.	No specific action required.	No mitigation required.
6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers	The policy and procedure will have no impact upon people of a different race, nationality, colour, culture or ethnic origin.	No specific action required.	No mitigation required.
6.7 People with a religion or belief or with no religion or belief.	The policy and procedure will have no impact upon people with a religion or	No specific action required.	No mitigation required.

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
The term 'religion' includes a religious or philosophical belief	belief, or with no religion or belief.		
6.8 People who are attracted to other people of: - the opposite sex (heterosexual); - the same sex (lesbian or gay); - both sexes (bisexual)	The policy and procedure will have no impact upon people based on sexual orientation.	No specific action required.	No mitigation required.
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	The policy and procedure will have no direct impact upon people according to their income-related group.	No specific action required.	No mitigation required.
6.10 People according to where they live:	The policy and procedure will have no direct impact	No specific action required.	No mitigation required.

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
Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities	upon people according to where they live.		
6.11 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service	No other groups are considered to be impacted by this policy and procedure, nor have any other risk factors been identified.	No specific action required.	No mitigation required.
6.12 Welsh Language			
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)			
Opportunities for persons to use the Welsh language	The policy and procedure will be published and available online in English and Welsh.	No specific action required.	No mitigation required.

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
Treating the Welsh language no less favourably than the English language	The policy and procedure will be published and available online in English and Welsh.	No specific action required.	No mitigation required.

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 specific population groups identified as being disproportionately impacted.	The policy and procedure are organisational governance documents relating to research misconduct. They do not directly change services or population-facing interventions, but support robust research governance and the generation of reliable evidence for the wider benefit of the population.

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 • Diet/nutrition/breastfeeding • Physical activity • Use of alcohol, cigarettes, e-cigarettes • Use of substances, non-prescribed drugs, abuse of prescription medication	The policy and procedure will have no direct impact on people's ability to	No unintended consequences or gaps identified.	No specific population groups affected.	No specific mitigation required.

• Social media use • Sexual activity • Risk-taking activity i.e. gambling, addictive behaviour	improve or maintain healthy lifestyles. It will support the generation of reliable research evidence to understand what works to improve or maintain healthy lifestyles.			
7.3 Social and community influences on health • 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	The policy and procedure will have no direct impact upon people in terms of social and community influences on health. They may indirectly support public trust by strengthening research integrity and transparency.	No unintended consequences or gaps identified.	No specific population groups affected.	No specific mitigation required.
7.4 Mental Wellbeing • Does this proposal support sense of control? • Does it enable participation in community and economic life? • Does it impact on emotional wellbeing and resilience?	The policy and procedure will have no direct population-level impact on mental wellbeing. The	No unintended consequences or gaps identified. The potential for stress or anxiety linked to	Staff directly involved in reporting, responding to or investigating an allegation.	Continue to ensure that staff are signposted to appropriate organisational support during implementation and future review.

	revised procedure recognises that research misconduct cases may affect the wellbeing of those involved and includes clearer arrangements for considering appropriate support.	misconduct processes is recognised in the procedure through attention to fairness, confidentiality and support.		
7.5 Living/ environmental conditions affecting health • 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 • Quality & safety of play areas (formal/informal) • Road safety • Urban/rural built & natural environment • Waste and recycling • Water quality	The policy and procedure will have no direct impact upon people in terms of living or environmental conditions.	No unintended consequences or gaps identified.	No specific population groups affected.	No specific mitigation required.
7.6 Economic conditions affecting health • Unemployment • Income, poverty (incl. food and fuel) • Economic inactivity • Personal and household debt	The policy and procedure will have no direct impact upon people in terms of income or	No unintended consequences or gaps identified.	No specific population groups affected.	No specific mitigation required.

- Type of employment i.e. permanent/temp, full/part time - Workplace conditions i.e. environment culture, H&S	employment status. They support clear governance for research-related workplace processes.			
7.7 Access and quality of services - 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	The policy and procedure provide safeguards for robust research governance and support the generation of reliable evidence for the wider benefit of the population of Wales across demographics.	No unintended consequences or gaps identified.	No specific population groups affected.	No specific mitigation required.
7.8 Macro-economic, environmental and sustainability factors - Biodiversity - Climate change/carbon reduction/flooding/heatwave - Cost of living i.e. food, rent, transport and house prices - Economic development including trade - Government policies i.e. Sustainable Development principle (integration; collaboration; involvement; long term thinking; and prevention) - Gross Domestic Product - Regeneration	The policy and procedure will have no direct impact upon people in terms of macro-economic, environmental or sustainability factors.	No unintended consequences or gaps identified.	No specific population groups affected.	No specific mitigation required.

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		
No significant adverse equality or health impacts have been identified. The reviewed policy and procedure strengthen governance, transparency and consistency in the management of research misconduct concerns, and introduce clearer arrangements relating to staff wellbeing, data protection, DATIX reporting, organisational advice routes and regulatory escalation where required. These changes provide opportunities to support a positive research culture and improve organisational assurance.	It is recommended that the reviewed policy and procedure proceed for final organisational approval and publication. As no material negative equality or health impacts have been identified, no additional mitigation actions are required at this stage beyond implementation of the revised procedure and review through the normal policy cycle.	Research Development and Strategy Lead		

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The policy and procedure have been reviewed in light of updated research integrity guidance and organisational governance requirements. The assessment considered whether the revisions would have differential impacts across protected characteristic groups or specific population groups. No differential adverse impacts were identified. The revised procedure supports a fair, proportionate and consistent approach to managing allegations of research misconduct and includes clearer arrangements for confidentiality, wellbeing, data protection, reporting, escalation and organisational learning.

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).