Equal Opportunities and Diversity Policy

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<th>DOCUMENT INFORMATION</th>
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<tr>
<td><strong>Author:</strong> Corporate HR Adviser with Ludlow Johnson, Equality &amp; Diversity Manager</td>
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<tr>
<td><strong>Consultation &amp; Approval:</strong> 17/02/2015 Agreed by PRG</td>
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<td><strong>This document replaces:</strong> Equal Opportunities &amp; Diversity Policy 2008</td>
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<td>• Staff Notice Boards</td>
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<td>• Intranet</td>
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# Equal Opportunities Policy

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### Appendices

- 1. Further Information, useful links

### Equality Impact Assessment
1. INTRODUCTION

1.1 This document outlines the Equal Opportunities Policy for the South Central Ambulance Service NHS Foundation Trust (the “Trust”) and is consistent with the principles outlined in Part 5 of the NHS National Terms and Conditions of Service Handbook.

1.2 It will provide a framework for the implementation of the Trust's responsibilities and obligations as a public sector employer in support of its aim to be an organisation that appreciates and benefits the diversity of the community it serves, its workforce and the contributions that both make.

1.3 The Trust is committed to promoting positive measures that eliminate all forms of unlawful or unfair discrimination on the grounds of age, marital status, disability, race, nationality, gender, religion, sexual orientation, gender reassignment, ethnic or national origin, beliefs, domestic circumstances, social and employment status, political affiliation or trade union membership, HIV status or any other basis not justified by law or relevant to the requirements of the post.

1.4 By committing to a policy encouraging equality of opportunity and diversity, the Trust values differences between members of the community and within its existing workforce and actively seeks to benefit from their differing skills, knowledge, and experience in order to provide an exemplary healthcare service. The Trust is committed to promoting equality and diversity best practice both within its own workforce and in any other area where it has influence.

1.5 The Trust will, therefore, take every possible step to ensure that individuals are treated equitably and fairly, with dignity and mutual respect, and that decisions in recruitment, selection, training, promotion and career management and the right to request flexible working and service provision are based solely on objective organisational factors and job-related criteria.

1.6 In September 2010, the Trust published a Single Equality Scheme which sets out how the Trust will meet its duties to staff, the populations served, and other stakeholders under the Race Relations Amendment Act 2000, the Equality Act 2010 and the Sex Discrimination Act as amended by the Equality Act 2006. It incorporates action plans to eliminate discrimination on the grounds of age, religion or belief or sexual orientation and will be regularly reviewed to ensure that it still reflects the values and aims of the Trust.

1.7 An Equality and Diversity Steering Group has been set up, whose purpose is to provide support, advice, assurance and governance for the Trust Board to ensure that the Trust is committed to developing a culture of promoting Equality and Diversity and eliminating all forms of discrimination.

1.8 The Group has agreed terms of reference and a working group has been arranged which will cover the 9 equality strands (see below). The working group is chaired by the Equality and Diversity Manager and will include SCAS staff.

- Age
- Disability
- Gender
- Sexual orientation
- Race
- Faith and belief
- Gender reassignment
- Pregnancy and maternity
- Marriage and civil partnership

2. SCOPE

2.1 This policy applies to all Trust employees and workers (including contractors,
temporary and bank staff and volunteers).

3. **ROLES AND RESPONSIBILITIES**

3.1 **Executive Board** has overall responsibility for Equal Opportunities within the Trust.

3.1.1 The Chief Executive is responsible for overseeing the policy.

3.1.2 Each Director has a responsibility for promoting equality and diversity within their particular portfolios.

3.1.3 The HR Director is responsible for the creation, development and operation of a policy of equal opportunities and for setting out the procedures to be observed in relation to all aspects of employment, including recruitment and selection.

3.1.4 The Operations Director, together with the Transformation and Organisational Development Director (NB, job titles subject to change), is responsible for ensuring that the provision of all services are consistent with the equality and diversity aims of the Trust.

3.2 **Human Resources** is responsible for keeping the provisions within this policy in line with employment legislation and best practice people management principles. They are also responsible for providing advice and guidance to all employees on the application of this policy.

3.3 **Managers** and **Trade Union representatives** are responsible for providing advice and guidance to employees on the application of this policy and procedure and for bringing any mutually beneficial improvements to this policy to the attention of the Trust.

3.4 **Employees** at all levels in the Trust are personally responsible for the practical application of this policy, and must support the Trust in creating and maintaining an environment that promotes equality of opportunity and diversity in practice. It is, therefore, the duty of all staff to co-operate with the measures introduced by the Trust to ensure equal opportunities and non-discrimination. All staff must:

- be familiar with and understand this policy;
- ensure that each service user is provided with an equal service, which takes into consideration the diverse needs of the population we serve;
- not discriminate unlawfully; eg, as supervisors, or managers or as a person responsible for selection decisions in recruitment, promotion, transfers, training etc;
- not discriminate unlawfully in relation to any of the services we provide and purchase;
- not induce or attempt to induce other employees or unions or management to practice unlawful discrimination;
- not victimise or attempt to victimise other employees or services users on the grounds that they have made complaints, or provided information on discrimination;
- be aware that malicious or unfounded allegations of discrimination may cause the Discipline & Conduct Policy to be invoked (see s9.14 of Dignity at Work policy);
- not harass, abuse or intimidate other employees or service users for any reason;
- report incidents of discrimination, abuse, victimisation or pressure to discriminate to their line manager or the Human Resources Department.
3.5 There must be no victimisation of any persons lodging a complaint on the grounds of discriminatory behaviour. All complaints will be taken seriously and, where appropriate, dealt with through the relevant Trust procedures.

4. WHAT IS DISCRIMINATION?

4.1 Breaches of the Trust’s commitment to equality and diversity can take many forms. The Trust will endeavour to ensure that no patients, Trust employees, workers, contractors, temporary or bank workers, volunteers, applicants, and service users or any other stakeholder is discriminated against, either directly or indirectly.

4.2 Direct Discrimination – treating a person less favourably on the grounds of their racial group, colour, ethnic or national origin, gender, pregnancy, marital status, age, disability, gender reassignment, sexual orientation (actual or perceived), religion or belief than you would treat others in the same or similar circumstances.

4.3 Indirect Discrimination – where an apparently neutral provision, criterion or practice puts one group of people at a substantial disadvantage to another on the grounds set out in the introduction to this policy unless that provision, criterion or practice is objectively justified by legitimate aim and the means of achieving that aim are appropriate and necessary.

4.4 Victimisation – where an individual is treated less favourably than others because he or she has taken action against the Trust under the Equality Act.

4.5 Harassment – when unwanted conduct related to any of the grounds referred to in s1.7 takes place with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may involve physical acts or verbal and non-verbal communication and gestures. For further information on bullying and harassment, please refer to the Trust’s Dignity at Work policy.

5. EMPLOYMENT LEGISLATION

5.1 The Trust has a legal obligation to ensure that it does not discriminate unlawfully; however, the Trust seeks to create a harmonious environment that goes beyond that described within, for example, the following statutory legislation:

- Equality Act 2010
- Equal Pay Act 1970
- Rehabilitation of Offenders Act 1974 (and Exceptions Order 1975)
- Employment Rights Act 1996

6. EQUAL OPPORTUNITIES AND DIVERSITY IN PRACTICE

6.1 Recruitment and Selection: The application of best practice in recruitment and selection is one of the foundations upon which the Trust relies in achieving equality of opportunity in and equal access to employment. We have developed and will keep under a process of review procedural guidelines on all matters designed to ensure that decisions on appointments are made wholly on merit. Our approach to implementing equality and diversity in recruitment and selection is covered under the Trust’s recruitment policy, which can be accessed via the intranet or the Trust website.

Information on recruitment and selection will be continuously monitored and reported on a quarterly basis to the Trust Board.
6.2 **Education, Training, and Development:** all staff have an equal opportunity to apply for education provision, that is available provided they meet the criteria. The NHS KSF requires all staff to undertake regular personal development reviews (PDR) and have an up to date Personal Development Plan (PDP). This is also a Department of Health requirement. Our approach to implementing equality and diversity in education, training and development is included in the Statutory & Mandatory Training Policy also the Corporate Induction Policy which can be accessed via the Trust’s website [www.southcentralambulance.nhs.uk](http://www.southcentralambulance.nhs.uk/).

6.3 **Publicity:** The Trust will endeavour to portray positive and diverse images of their staff in all literature, publicity material and public documents, and actively seek to illustrate their successes with regard to equal opportunities practices.

6.4 **Policy and Organisational Development:** All organisational development changes, such as changes to shift/rota patterns, review of service provision, change of work base and all new Trust policies (including clinical, HR and operational) will be subject to a Equality Impact Assessment before starting the work. This will ensure that any equality issues are considered whilst policies are written or changes made.

6.5 An Equality Impact Assessment should then be carried out at the end of the project or policy approval. The Equality Impact Assessment should be carried out by the manager managing the change or writing the policy, however assistance can be requested from the HR department. See s10 for more information regarding EqIAs.

7. **DEALING WITH COMPLAINTS**

7.1 The Trust will treat seriously all complaints of discrimination or harassment related to any of the grounds set out in the Equal Opportunities policy statement (refer s1.1), irrespective of whether the complaint is made by an employee, manager, service user, or any other relevant third party.

7.2 Any service user or relevant third party who believe they have not been treated equitably in accordance with this policy nor have a complaint of discrimination, harassment or victimisation make their complaint using the Trust’s Patient Advice and Liaison Service (PALS), which can be contacted via the Trust’s website.

7.3 Employees who believe that they have not been treated equitably in accordance with this policy, or have a complaint of discrimination, harassment or victimisation may make their complaint using the Trust’s existing Grievance Policy, or the Dignity at Work Policy. Alternatively, employees may wish to opt for the complaint to be handled on an informal basis, through discussion with their Line Manager or HR Advisor in the first instance. In this circumstance, employees may approach their line manager or (if preferred) a member of the HR department for advice and guidance.

7.4 Any breach of this policy is a disciplinary offence and will be dealt with through the Trust’s Disciplinary procedure. Any employee found to have unfairly discriminated, harassed, or victimised a service user, third party, another member of staff, a volunteer or a contractor may be dismissed. Where action short of dismissal is appropriate, this may include a requirement for the individual to attend suitable training. The individual may be prevented from participating in employment processes including short-listing, assessment centres and interview, allocation of shifts or overtime, recommendation for appointment, recommendation for training, competency assessment, mentoring, appraisal processes and disciplinary processes. This list is not exhaustive. This sanction may only be used to prevent unfair discrimination, harassment or victimisation.
7.5 Any breach of this policy by a third party will result in the third party’s employer, if applicable, being contacted and a formal complaint being made using the employer’s procedures. Any breach of this policy by a service user, will result in a review of the provision of service and a report made to the police. If appropriate, the Trust will seek to follow legal proceedings.

8. WHISTLEBLOWING & EQUALITY

8.1 Remember that everyone has a right and a duty to report an issue of propriety. This is where it is felt that the law has been broken or the usual communication channels have been exhausted. Staff can obtain direct access Senior Managers and/or a named Non-Executive Director. Third party and service users should contact the Trust’s PALS service.

8.2 Further information on responsibilities of staff in respect of confidentiality can be found in the Trust’s Whistleblowing Policy.

9. MONITORING EQUALITY

9.1 The Trust acknowledges that monitoring is necessary to demonstrate compliance with legal requirements and to assist in the analysis required to assess and to enhance the effectiveness of the Equal Opportunities policy, procedures and implementation. The Equality and Diversity Steering Group will ensure that agreed monitoring processes are in place.

9.2 The Assistant Director of Learning & Development will ensure that appropriate training records for staff are maintained.

9.2.1 The Trust will investigate and actively seek to redress situations where it is found that individuals from particular groups:

- Do not apply for employment/promotion, or that fewer than expected apply;
- Are not recruited or promoted at all, or are appointed in a significantly lower proportion than their rate of applications;
- Are under-represented in certain jobs, bands or departments;
- Are concentrated in certain jobs/bands/departments and there appears to be a point beyond which they do not rise.

10. EQUALITY IMPACT ASSESSMENTS (Equality Analysis)

10.1 The Trust has a duty to undertake Equality Impact Assessments (EqIA) as a requirement of existing equality legislation. Equality Impact Assessments can assist organisations in the delivery of their business objectives to achieve equal outcomes for their staff and local community.

10.2 Equality Impact assessments are a way of examining the main functions and policies of an organisation to see whether they have the potential to affect people differently. Their purpose is to identify and address real or potential inequalities resulting from policy and practice development. An EqIA should cover all of the nine strands of diversity and ensure that all receive equitable attention.

10.3 Impact assessments will help to gain an understanding the functions of an organisation and the way decisions are made by:

- considering the current situation;
deciding what is to be achieved - i.e. the objectives and intended outcomes of a function or policy;

considering what evidence there is to support the decision;

where the gaps are in terms of evidence to support the decision;

making an informed decision;

reporting / publishing that decision.

10.4 Further information on Equality Impact Assessments, including how to conduct them, and whether they are required for your area is set out in the Trust’s Single Equality Scheme.

11. POLICY REVIEW

11.1 This policy will be reviewed every 2 years or more frequently if significant changes to its effective operation are necessary. Any amendments to the policy will be made by the Trust only after full consultation with staff and service users through the recognised joint consultative mechanism.

12. RELATED POLICIES

12.1 All SCAS policies must be written, read, monitored and reviewed in the light of the contents of this policy and an Equality Impact Assessment carried out.
FURTHER INFORMATION

Further information on equal opportunities, managing diversity and your rights under employment law can be found as follows:

**Divisional Human Resources Departments**
Each Divisional HR department will be able to provide guidance on the statutory and organisational policy provisions.

Additionally, the Staff Welfare and Benefits Co-ordinator will provide support.

**Employee Assistance Programme**
The Trust provides a free Employee Assistance Programme provided by PPC Worldwide. PPC offer expert advice, invaluable information, specialist counselling and support for staff and their family members. PPC are available using the contact details below 24 hours a day, 7 days a week, online or on the phone. They aim to answer questions immediately, or to refer staff to the most appropriate advisor, counsellor or source of information, including legal, financial, consumer and personal all completely confidentially.

Phone: 0800 282193
Website: [www.ppconline.info](http://www.ppconline.info)

**Recognised Unions**
Unison
UNITE (TGWU Section)
APAP

**Equality and Human Rights Commission**
On 1st October 2007, The *Equality and Human Rights Commission* was formed, replacing the three former equality commissions: the Commission for Racial Equality (CRE), the Disability Rights Commission (DRC) and the Equal Opportunities Commission (EOC). The new commission brings together the work of the three previous equality commissions and also takes on responsibility for the other aspects of equality: age, sexual orientation and religion or belief, as well as human rights. The commission enforces equality legislation on age, disability, gender, race, religion or belief, sexual orientation or transgender status, and encourages compliance with the Human Rights Act.

Website: [www.equalityhumanrights.com](http://www.equalityhumanrights.com)

**ACAS**
ACAS has a number of publications outlining employees’ rights and employer responsibilities including an advisory booklet on promoting equality.


[equality and diversity]

**Very useful guide to the Equality Act 2010**
Follow this link to a clear explanation of what is enshrined within the new Act:
Equality Impact Assessment Form Section One – Screening

Name of Function, Policy or Strategy: Equal Opportunities Policy
Officer completing assessment: Judy Macdonald
Telephone: 01869 365055

1. What is the main purpose of the strategy, function or policy?
To give definitions; clearly explain the legal requirements of the Equality Act and how it relates to the workplace; set out the responsibilities of all staff and managers.

2. List the main activities of the function or policy
Define discrimination; responsibilities of all staff; how to deal with equality issues.

3. Who will be the main beneficiaries of the strategy/function/policy?
All staff; all workers in SCAS.

1. Use the table overleaf to indicate the following:-
   a. Where do you think that the strategy/function/policy could have an adverse impact on any equality group, i.e. it could disadvantage them?
   b. Where do you think that there could be a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups?
<table>
<thead>
<tr>
<th>Category</th>
<th>Positive Impact</th>
<th>Negative Impact</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GENDER</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Women</td>
<td>Yes</td>
<td>N/A</td>
<td>Work-life balance – especially with reference to the care of children and elderly relatives.</td>
</tr>
<tr>
<td>Men</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td><strong>RACE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian or Asian British People</td>
<td>Yes</td>
<td>Yes</td>
<td>Clear definition of discrimination and how to deal with it. Possible language difficulties if English not first language</td>
</tr>
<tr>
<td>Black or Black British People</td>
<td>Yes</td>
<td>Yes</td>
<td>Clear definition of discrimination and how to deal with it. Possible language difficulties if English not first language</td>
</tr>
<tr>
<td>Chinese people and other people</td>
<td>Yes</td>
<td>Yes</td>
<td>Clear definition of discrimination and how to deal with it. Possible language difficulties if English not first language</td>
</tr>
<tr>
<td>People of Mixed Race</td>
<td>Yes</td>
<td>Yes</td>
<td>Clear definition of discrimination and how to deal with it. Possible language difficulties if English not first language</td>
</tr>
<tr>
<td>White (inc Irish) people</td>
<td>Yes</td>
<td>N/A</td>
<td>Clear definition of discrimination and how to deal with it. Possible language difficulties if English not first language</td>
</tr>
<tr>
<td><strong>DISABLED PEOPLE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lesbians, gay men and bisexuals</td>
<td>Yes</td>
<td>N/A</td>
<td>Clear definition of discrimination and how to deal with it. Possible learning difficulties</td>
</tr>
<tr>
<td>Transgender</td>
<td>Yes</td>
<td>N/A</td>
<td>Clear definition of discrimination and how to deal with it.</td>
</tr>
<tr>
<td><strong>AGE</strong></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Older People (60+)</td>
<td>Yes</td>
<td>N/A</td>
<td>Clear definition of discrimination and how to deal with it.</td>
</tr>
<tr>
<td>Younger People (17 to 25) and children</td>
<td>Yes</td>
<td>N/A</td>
<td>Clear definition of discrimination and how to deal with it.</td>
</tr>
<tr>
<td>Positive Impact</td>
<td>Negative Impact</td>
<td>Reasons</td>
<td></td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------------</td>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>Faith Groups</td>
<td>Yes</td>
<td>N/A</td>
<td>Clear definition of discrimination and how to deal with it.</td>
</tr>
<tr>
<td>Equal Opportunities and/or improved relations</td>
<td>Yes</td>
<td>N/A</td>
<td>Clear definition of discrimination and how to deal with it. Yes – ensuring that a fair and consistent process is followed for all Trust staff.</td>
</tr>
</tbody>
</table>

**Notes:** Faith groups cover a wide range of groupings, the most common of which are Muslims, Buddhists, Jews, Christians, Sikhs and Hindus. Consider faith categories individually and collectively when considering positive and negative impacts.

The categories used in the race section refer to those used in the 2001 Census. Consideration should be given to the specific communities within the broad categories such as Bangladeshi people and to the needs of other communities that do not appear as separate categories in the Census, for example, Polish.
5. If you have indicated that there is a negative impact, is that impact:

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legal (it is not discriminatory under anti-discriminatory law)</td>
<td>x</td>
</tr>
<tr>
<td>Intended</td>
<td>x</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Level of Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>High</td>
</tr>
</tbody>
</table>

If the negative impact is possibly discriminatory and not intended and/or of high impact then please complete a thorough assessment after completing the rest of this form.

6(a). Could you minimise or remove any negative impact that is of low significance? Explain how below:

- Clear, simple language used. Line managers support and guide their staff to understand what has been written in the policy and the impact/effect it would have on them.

6(b). Could you improve the strategy, function or policy positive impact? Explain how below:

- By using clear and simple language.

7. If there is no evidence that the strategy, function or policy promotes equality, equal opportunities or improves relations – could it be adopted so it does? How?

- N/A

Please sign and date this form; keep a copy and send one to the Trust’s Equality Lead.

<table>
<thead>
<tr>
<th>Signed:</th>
<th>Name:</th>
<th>Date:</th>
</tr>
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<tbody>
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</tbody>
</table>
Equality Impact Assessment Form Section Two – Full Assessment

Name of Function, Policy or Strategy: Equal Opportunities Policy
Officer completing assessment: Judy Macdonald
Telephone: 01869 365055

Part A

1. Looking back at section one of the EqIA, in what areas are there concerns that the strategy, policy or project could have a negative impact?

   - Gender [x]
   - Race [x]
   - Disability [x]
   - Sexuality/Transgender [ ]
   - Age [ ]
   - Faith [ ]

2. Summarise the likely negative impacts:

   Difficulties with understanding relating to language problems and/or learning disabilities
   No perceived issues relating to other groups; actively addresses most.

3. Using the table below, give a summary of what previous or planned consultation on this topic, policy, function or strategy has or will take place with groups or individuals from the equality target groups and what has this consultation noted about the likely negative impact?

<table>
<thead>
<tr>
<th>Equality Target Groups</th>
<th>Summary of consultation planned or taken place</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td>Standard 21-day consultation for reviewed policies</td>
</tr>
<tr>
<td>Race</td>
<td>Standard 21-day consultation for reviewed policies</td>
</tr>
</tbody>
</table>
### Equality Target Groups Summary of consultation planned or taken place

<table>
<thead>
<tr>
<th>Equality Target Groups</th>
<th>Summary of consultation planned or taken place</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>Standard 21-day consultation for reviewed policies</td>
</tr>
<tr>
<td>Sexuality/Transsexuality</td>
<td></td>
</tr>
<tr>
<td>Older People</td>
<td></td>
</tr>
<tr>
<td>Younger People</td>
<td></td>
</tr>
<tr>
<td>Faith</td>
<td></td>
</tr>
</tbody>
</table>

4. What consultation has taken place or is planned with Trust staff including staff that have or will have direct experience of implementing the strategy, policy or function?
   - Standard 21-day consultation for reviewed policies
   - ..............................................................
   - ..............................................................
   - ..............................................................

5. Check that any research, reports, studies concerning the equality target groups and the likely impact have been used to plan the project and guide or indicate what research you intend to carry out:

<table>
<thead>
<tr>
<th>Equality Target Groups</th>
<th>Title/type of/details of research/report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td></td>
</tr>
<tr>
<td>Race</td>
<td></td>
</tr>
<tr>
<td>Disability</td>
<td></td>
</tr>
<tr>
<td>Sexuality/Transsexuality</td>
<td></td>
</tr>
<tr>
<td>Equality Target Groups</td>
<td>Title/type of/details of research/report</td>
</tr>
<tr>
<td>------------------------</td>
<td>----------------------------------------</td>
</tr>
<tr>
<td>Older People</td>
<td></td>
</tr>
<tr>
<td>Younger People</td>
<td></td>
</tr>
<tr>
<td>Faith</td>
<td></td>
</tr>
</tbody>
</table>

6. If there are gaps in your previous or planned consultation and research, are there any experts/relevant groups that can be contacted to get further views or evidence on the issues?

- [ ] Yes *(please list them and explain how you will obtain their views)*

- [ ] No
Part B
Complete this section when consultation and research has been carried out

7a. As a result of this assessment and available evidence collected, including consultation, state whether there will be a need to be any changes made/planned to the policy, strategy or function.

7b. As a result of this assessment and available evidence, is it important that the Trust commissions specific research on this issue or carries out monitoring/data collection?

(You may want to add this information directly on to the action plan at the end of this assessment form)

Where reasonable comments have been made and feedback received, amendments are made to the policy accordingly. No need for any specific research or data collection.

8. Will the changes planned ensure that negative impact is:
   Legal? [ ]
   (not discriminatory, under anti-discriminatory legislation)
   Intended? [ ]
   Low impact? [ ]

9a. Have you set up a monitoring/evaluation/review process to check the successful implementation of the strategy, function or policy?
    Yes [ ] No [ ]

9b. How will this monitoring/evaluation further assess the impact on the equality target groups/ensure that the strategy/policy/function is non-discriminatory?

Details: ......................................................................................................................................................
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Please complete the action plan overleaf, sign the EqIA, retain a copy and send a copy of the full EqIA and Action Plan to the Trust’s Equality Lead.

Signed: ......................................................................................................................................................

Name: ......................................................................................................................................................

Date: ......................................................................................................................................................
<table>
<thead>
<tr>
<th>Issue</th>
<th>Action Required</th>
<th>Lead Officer</th>
<th>Timescale</th>
<th>Resource Implications</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Difficulties of understanding</td>
<td>Plain English, simple language</td>
<td></td>
<td>During drafting</td>
<td>Built into process</td>
<td></td>
</tr>
<tr>
<td>Ditto</td>
<td>Managers to support staff to understand</td>
<td></td>
<td>In use, ongoing</td>
<td>Shouldn’t be any.</td>
<td></td>
</tr>
</tbody>
</table>

Please continue on another sheet if you need to.