

# Equality Impact Analysis: Form

NLCCG Communications  
and Engagement Strategy

April 2014

For support with completion of this documentation, please see the accompanying guidance and/or contact the Equality Lead in the North Yorkshire and Humber Commissioning Support Unit

## 1. Equality Impact Analysis

|   |   |   |
|---|---|---|
| <b>Policy / Project / Function:</b>   | Communications and Engagement Strategy 2014 - 16  |   |
| <b>Date of Analysis:</b>  | March 2014  |   |
| <b>This Equality Impact Analysis was completed by: (Name and Department)</b>                      | Emma Parker – CSU Corporate Team  |   |
| <b>What are the aims and intended effects of this policy, project or function ?</b>               | The aim of this strategy is to provide the CCG Governing Body, Council of Members, partner organisations and the public with not only a vision of how the communications and engagement should be shaped, but a route map of how the engaging and informing will be achieved. |   |
| <b>Please list any other policies that are related to or referred to as part of this analysis</b> | Health and Social Care Act 2012<br>North Lincolnshire CCG Constitution<br>Equality Act  |   |
| <b>Who does the policy, project or function affect ?</b><br><br>Please Tick ✓                     | Employees<br><br>Service Users<br><br>Members of the Public<br><br>Other (List Below)   | X<br><br>X<br><br>X<br><br><input type="checkbox"/> |

## 2. Equality Impact Analysis: Screening

|                                | Could this policy have a positive impact on... |                                     | Could this policy have a negative impact on... |                                     | Is there any evidence which already exists from previous (e.g. from previous engagement) to evidence this impact |
|--------------------------------|--|-------------------------------------|--|-------------------------------------|--|
|                                | Yes  | No                                  | Yes  | No                                  |  |
| <b>Race</b>                    | <input checked="" type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/>            | <input type="checkbox"/>            |  |
| <b>Age</b>                     | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/>            | <input type="checkbox"/>            |  |
| <b>Sexual Orientation</b>      | <input checked="" type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> |  |
| <b>Disabled People</b>         | <input checked="" type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/>            | <input type="checkbox"/>            |  |
| <b>Gender</b>                  | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> |  |
| <b>Transgender People</b>      | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> |  |
| <b>Pregnancy and Maternity</b> | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> |  |
| <b>Marital Status</b>          | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> |  |
| <b>Religion and Belief</b>     | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>                       | <input checked="" type="checkbox"/> |  |
| <b>Reasoning</b>               |  |                                     |  |                                     |  |

**If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7**

### 3. Equality Impact Analysis: Local Profile Data

#### Local Profile/Demography of the Groups affected (population figures)

|                                       |  |
|---------------------------------------|--|
| <b>General</b>                        | Population - 167,446 (Census 2011)   |
| <b>Age</b>                            | Between now and 2015 our population is projected to rise by a further 8% and our older population by 26%.<br>(Census 2011)   |
| <b>Race</b>                           | 7.35 of population are from BME communities.<br><br>The largest groups are people of Pakistani, Indian and Bangladeshi heritage.<br><br>1,767 households had no residents whose main language was English. (Census 2011) |
| <b>Sex</b>                            | 49.3% male and<br>50.7% female<br><br>(2011 Census).   |
| <b>Gender reassignment</b>            | No official statistics but GIRES (Gender Identity Research and Education Society) estimate that 1% of the population are gender variant to some degree   |
| <b>Disability</b>                     | 19.2% of North Lincolnshire residents stated that they had a long term illness or disability.<br><br>19.3% of residents felt their day to day activities were limited either a little or a lot<br><br>(2011 Census).     |
| <b>Sexual Orientation</b>             | No accurate stats. Research estimates that LGBT is about 5% of the total population (approx. 8,000 people)   |
| <b>Religion, faith and belief</b>     | Christianity 66%<br><br>No religion 24%<br><br>Religion not stated 7%<br><br>Muslim 1% (1,740 residents)<br><br>(2011 Census).   |
| <b>Marriage and civil partnership</b> | This protected characteristic generally only applies in the workplace.   |

## 4. Equality Impact Analysis: Equality Data Available

### Is any Equality Data available relating to the use or implementation of this policy, project or function?

Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine *Protected Characteristics* – referred to hereafter as ‘*Equality Groups*’.

Examples of *Equality Data* include: (this list is not definitive)

1. Application success rates *Equality Groups*
2. Complaints by *Equality Groups*
3. Service usage and withdrawal of services by *Equality Groups*
4. Grievances or decisions upheld and dismissed by *Equality Groups*
5. *Previous EIAs*

Yes ☐

No ☒

Where you have answered yes, please incorporate this data when performing the *Equality Impact Assessment Test* (the next section of this document).

### List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function

Discussions have been had with CCG executive management and also in a Governing Body workshop. The Lay Member for PPI has also been involved in the creation of the strategy.

### Promoting Inclusivity How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation

The North Lincolnshire CCG Communication and Engagement Strategy supports the CCGs commitment to ensuring inclusivity with all of its communication and engagement activity. It will endeavour to make information accessible to all with provision of alternative formats when required

## 5. Equality Impact Analysis: Assessment Test

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

| Protected Characteristic:          | No Impact: | Positive Impact: | Negative Impact: | Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists   |
|------------------------------------|------------|------------------|------------------|--|
| <b>Gender</b><br>(Men and Women)   | X          |                  |                  | <b>NL CCG Database</b> – The database should be regularly analysed to ensure that the membership is representative of the local population. Where diverse groups appear to be underrepresented, work should be carried out to ensure that they are being communicated with effectively.  |
| <b>Race</b><br>(All Racial Groups) |            | X                | X                | <p><b>NL CCG Database</b> – The strategy indicates that to join the NLCCG Patient database you are required to sign up on the website. Options should be available for signing up in alternative formats such as alternative languages, hard copy, large print, braille or via the telephone.</p> <p><b>NL CCG Database</b> – The database should be regularly analysed to ensure that the membership is representative of the local population. Where diverse groups appear to be underrepresented, work should be carried out to ensure that they are being communicated with effectively.</p> <p><b>Communicating with Stakeholders</b> – The strategy advises that the CCG will ‘aim to communicate in plain English at all times, with the provision of alternative formats such as braille, audio, large print, easy read and other languages where appropriate’</p> <p><b>Methods of Communications</b> – further details should be included in the strategy regarding methods of ensuring that diverse groups are communicated with effectively. For example distributing posters and leaflets in locations where diverse groups congregate (social clubs for ethnic minority groups/shops aimed at diverse ethnic groups). When engaging in the community ensure that diverse groups are included and suitable support such as Interpreters are employed.</p> |

## 1. Equality Impact Analysis: Assessment Test

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

| Protected Characteristic:                  | No Impact: | Positive Impact: | Negative Impact: | Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists   |
|--|------------|------------------|------------------|--|
| <b>Disability</b><br>(Mental and Physical) |            | X                | X                | <p><b>NL CCG Database</b> – The strategy indicates that to join the NLCCG Patient database you are required to sign up on the website. Options should be available for signing up in alternative formats such as alternative languages, hard copy, large print, braille or via the telephone.</p> <p><b>NL CCG Database</b> – The database should be regularly analysed to ensure that the membership is representative of the local population. Where diverse groups appear to be underrepresented, work should be carried out to ensure that they are being communicated with effectively.</p> <p><b>Communicating with Stakeholders</b> – The strategy advises that the CCG will ‘aim to communicate in plain English at all times, with the provision of alternative formats such as braille, audio, large print, easy read and other languages where appropriate’</p> <p><b>Methods of Communications</b> – further details should be included in the strategy regarding methods of ensuring that diverse groups are communicated with effectively. For example advertising in local Talking Newspapers, distributing posters and leaflets in locations where diverse groups congregate (Institutes for the Deaf/Visually impaired). When engaging in the community ensure that diverse groups are included and suitable support such as BSL Interpreters are employed.</p> |



## Equality Impact Analysis: Assessment Test (continued)

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

| Protected Characteristic: | No Impact: | Positive Impact: | Negative Impact: | Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists   |
|---------------------------|------------|------------------|------------------|--|
| Religion or Belief        | X          |                  |                  | <p><b>NL CCG Database</b> – The database should be regularly analysed to ensure that the membership is representative of the local population. Where diverse groups appear to be underrepresented, work should be carried out to ensure that they are being communicated with effectively.</p> <p><b>Methods of Communications</b> – further details should be included in the strategy regarding methods of ensuring that diverse groups are communicated with effectively. For example distributing posters and leaflets in locations where diverse groups congregate (social clubs for ethnic minority groups/shops aimed at diverse ethnic groups). When engaging in the community ensure that diverse groups are included and suitable support such as Interpreters are employed.</p> |

## Equality Impact Analysis: Assessment Test (continued)

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

| Protected Characteristic:   | No Impact: | Positive Impact: | Negative Impact: | Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists  |
|---|------------|------------------|------------------|---|
| <b>Sexual Orientation (Heterosexual, Homosexual and Bisexual)</b> | X          |                  |                  | <p><b>NL CCG Database</b> – The database should be regularly analysed to ensure that the membership is representative of the local population. Where diverse groups appear to be underrepresented, work should be carried out to ensure that they are being communicated with effectively.</p> <p><b>Methods of Communications</b> – further details should be included in the strategy regarding methods of ensuring that diverse groups are communicated with effectively. For example advertising in local LGBT magazines (if available), distributing posters and leaflets in locations where LGBT groups may meet such as LGBT pubs/nightclubs, asking the LGBT Group to assist with engagement.</p> |
| <b>Pregnancy and Maternity</b>                                    | X          |                  |                  |   |

## Equality Impact Analysis: Assessment Test (continued)

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

| Protected Characteristic: | No Impact: | Positive Impact: | Negative Impact: | Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists  |
|---------------------------|------------|------------------|------------------|---|
| <b>Transgender</b>        | x          |                  |                  | <p><b>NL CCG Database</b> – The database should be regularly analysed to ensure that the membership is representative of the local population. Where diverse groups appear to be underrepresented, work should be carried out to ensure that they are being communicated with effectively.</p> <p><b>Methods of Communications</b> – further details should be included in the strategy regarding methods of ensuring that diverse groups are communicated with effectively. For example advertising in local LGBT magazines (if available), distributing posters and leaflets in locations where LGBT groups may meet such as LGBT pubs/nightclubs, asking the LGBT Group to assist with engagement.</p> |

## Equality Impact Analysis: Assessment Test (continued)

What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

| Protected Characteristic: | No Impact: | Positive Impact: | Negative Impact: | Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists  |
|---------------------------|------------|------------------|------------------|---|
| Marital Status            | X          |                  |                  |   |
| Age                       |            | X                | X                | <p><b>NL CCG Database</b> – The strategy indicates that to join the NLCCG Patient database you are required to sign up on the website. Options should be available for signing up in alternative formats such as alternative languages, hard copy, large print, braille or via the telephone.</p> <p><b>Communicating with Stakeholders</b> – The strategy advises that the CCG will ‘aim to communicate in plain English at all times, with the provision of alternative formats such as braille, audio, large print, easy read and other languages where appropriate’</p> <p><b>Methods of Communications</b> – further details should be included in the strategy regarding methods of ensuring that diverse groups are communicated with effectively. For example advertising in local Talking Newspapers, distributing posters and leaflets in locations where diverse groups congregate (social clubs for older people, Older People’s Groups), asking Older People’s Charter Groups to assist with engagement.</p> |

## 2. Action Planning

**As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?**

| Identified Risk:   | Recommended Actions:   | Responsible Lead:  | Completion Date: | Review Date: |
|--|--|--|------------------|--------------|
| <b>NL CCG Database</b> – The strategy requires that people register via the website. There is a risk that membership of the NLCCG Patient database will not be representative of the local population. | To ensure inclusivity of all diverse groups update the strategy to allow an option to sign up in alternative formats such as alternative languages, hard copy, large print, braille or via the telephone.  | NL Engagement Lead – CSU embedded                          | By end June 14   |              |
| <b>NL CCG Database</b> – Risk of members that are not representative of the local population   | Update the policy to advise that the database should be regularly analysed to ensure that the membership is representative of the local population. Where diverse groups appear to be underrepresented, work should be carried out to ensure that they are being communicated with effectively.  | NL Engagement Lead – CSU embedded                          | Ongoing          | 6 monthly    |
| <b>Methods of Communications</b> - Risk of diverse groups being missed with communications because the methods of communication does not meet their needs  | Update the policy to ensure that that any list of communication methods is comprehensive and includes approaches such as Talking Newspapers, distributing posters and leaflets in locations where diverse groups congregate (Institutes for the Deaf/Visually impaired, social clubs for ethnic minority groups/shops aimed at diverse ethnic groups, Older People's Groups).<br><br>Also When engaging in the community, ensure that diverse groups are included and suitable support such as BSL/language Interpreters are employed. | NL Engagement Lead – NL communications Lead - CSU embedded | Ongoing          | 6 Monthly    |

### 3. Equality Impact Analysis Findings

|                         |                              |                                    |         |                                |
|-------------------------|------------------------------|------------------------------------|---------|--------------------------------|
| <b>Analysis Rating:</b> | <input type="checkbox"/> Red | <input type="checkbox"/> Red/Amber | X Amber | <input type="checkbox"/> Green |
|-------------------------|------------------------------|------------------------------------|---------|--------------------------------|

|   |   | Actions  | Wording for Policy / Project / Function   |
|---|---|--|---|
| <b>Red</b><br><br><b>Stop and remove the policy</b> | <b>Red:</b> As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.                                       | <b>Remove the policy</b><br><br>Complete the action plan above to identify the areas of discrimination and the work or actions which needs to be carried out to minimise the risk of discrimination.   | No wording needed as policy is being removed  |
| <b>Red Amber</b><br><br><b>Continue the policy</b>  | As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken. | <b>The policy can be published with the EIA</b><br><br>List the justification of the discrimination and source the evidence (i.e. clinical need as advised by NICE).<br><br>Consider if there are any potential actions which would reduce the risk of discrimination.<br><br>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date. | As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason exists which justifies the use of this policy and further professional advice.<br><br><b><i>[Insert what the discrimination is and the justification of the discrimination plus any actions which could help what reduce the risk]</i></b> |

## Equality Impact Findings (continued):

|  |   | Actions  | Wording for Policy / Project / Function   |
|--|---|--|---|
| <b>Amber</b><br><br><b>Adjust the Policy</b> | <p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> | <p><b>The policy can be published with the EIA</b></p> <p>The policy can still be published but the Action Plan must be monitored to ensure that work is being carried out to remove or reduce the discrimination.</p> <p>Any changes identified and made to the service/policy/ strategy etc. should be included in the policy.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p> | <p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> <p><b><i>[Insert what the discrimination is and what work will be carried out to reduce/eliminate the risk]</i></b></p> |
| <b>Green</b><br><br><b>No major change</b>   | <p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>                           | <p><b>The policy can be published with the EIA</b></p> <p>Another EIA must be completed if the policy is changed, reviewed or if any discrimination is identified at a later date</p>  | <p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>   |

|   |  |
|---|--|
| <b>Brief Summary/Further<br/>comments</b> |  |
|---|--|

| <b>Approved By</b> |              |              |
|--------------------|--------------|--------------|
| <b>Job Title:</b>  | <b>Name:</b> | <b>Date:</b> |
|                    |              |              |