

Primary Care Equality Impact Assessment

Guidance and Template

Supporting notes and guidance

The following guidance note and template has been produced to support practices to undertake an Equality Impact Assessment (EIA).

The Phase 2 Access Standards include a requirement for practices to complete a reflective report. The completion of an Equality Impact Assessment forms part of the reflective report requirement.

This supporting note and associated template can be used to complete other EIAs and is not specifically linked to the Access Standards, therefore some of the examples for consideration in the guidance may not be applicable to a particular EIA the practice is undertaking, however will be a useful reference tool for future EIAs a practice may undertake.

Following the completion of the National Patient Experience Survey, reviewing patient digital requests and utilising telephone system intelligence will enable Practices to review population and access needs and undertake an Equality Impact Assessment to include any proposed changes to access. The Equality Impact Assessment needs to link in with the practices post survey action plan.

Any organisation providing a public function is subject to the general duty under the Equality Act 2020. This therefore includes Primary Care Independent Contractors in relation to their public functions.

In summary, those subject to the general equality duty must have had due regard to the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act.
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Equality Impact Assessments **must** be carried out for all new policies, strategies, service plans, new services and service change proposals.

Generally speaking, the majority of new policies, strategies, and plans, will be developed with the intention of improving conditions for members of staff and the public. They usually promote equality and seek to have a positive impact. The EIA template may prompt you to make further improvements to your document which you may not have considered previously. It could also highlight any

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possible omissions or issues which you may need to address before implementation of new service plans/service change proposals

Significant new service proposals and service change will require a more in-depth consultation and engagement procedure and will require a more detailed EIA.

The following guidelines provide a simple template to help primary care independent contractors consider the general equality duty in relation to the services they provide, and particularly in relation to any plans for changes in the ways those services are provided.

It is good practice to engage with service users and other stakeholders (e.g. Practice Participation Group) in the development and ongoing review of your equality impact assessment. For example, by asking them what they think the impact might be, working with them to agree mitigation actions to address adverse impact, and continuing your dialogue to check that your actions are having the desired effect.

In addition to the statutory duties under the Equality Act and the nine protected characteristics it is also good practice for independent contractors to also consider the impact on:

- Welsh Language
- Carers
- People living in Socio Economic Disadvantage

Preparing your EIA document

1. Service Change Proposal / Strategy / Policy

You should state the title outline the nature of what you are equality impact assessing here.

2. Background / Introduction:

Use this section to give context to the EIA. You should introduce the EIA outlining the details of the proposal. This section should also include details about the nature of your service, the area it covers and the population it serves.

For example, consideration should be given to the following:

- General information on the primary care service – which areas does it cover? Who does it serve? It would be good to include some basic info about

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the local population and your service users if they are available to you, e.g. age range of service users / how many have a registered disability / any social deprivation / rural challenges, etc.

- Description of the proposal / Background situation e.g. why are you undertaking an EIA? What changes to services are you making? What do you propose? Why are you making these changes? How have demands on the primary care service changed and what changes are needed to incorporate them? What is your current capacity to deliver the required changes? What resources are available to meet the needs of your service users and implement the required changes? Is there any data / statistics / graphs to illustrate the type of services accessed over a set period of time to demonstrate any trends / changes in access to services? Is there any data that you can share to demonstrate how you have reached your decision to make the proposed changes?

3. Description of the EIA undertaken

What did you do? You should provide details about the level of consultation/engagement you have undertaken. The feedback obtained from the consultation/engagement needs to inform your EIA, so giving details about the type of engagement you have done is paramount.

You should include precise details – dates, timescales, how people were invited to respond, etc.

You should provide more specific details of the consultation/engagement which took place e.g., give details of any public meeting events, social media engagement, letter correspondence, posters, notices, local press announcements, patient surveys etc. Did you consider any other form of consultation and engagement? What there any restrictions? For example, due to COVID-19, inclement weather, etc, and what impact did this have?

How many responses were received? How were they received? How have you analysed them?

Do you have plans for any continued engagement / communication with service users?

What was the expected outcome of the EIA? Did this differ to the actual outcome?

Was there a mix of positive and negative responses to the proposals?

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4. Common Themes

You should acknowledge and analyse any common themes arising from the responses received. It is important to demonstrate that you have listened and reflected on concerns/issues raised and have explored mitigating actions. What discussions have taken place after the consultation/engagement? How have you analysed the responses? Have you sought advice from external organisations? E.g. support from Service Improvement Manager for Equality in PTHB, 3rd Sector organisations, etc.? Do you intend to seek advice from other organisations to help put mitigating actions in place? E.g. Local Councils, Accessibility Powys, RNIB, local action groups, patient stakeholder groups, etc?

5. Lessons Learned / Mitigating Actions

You should look at each of the common themes identified and explain how you have or will address any concerns/issues

For example, if a key theme appears to be miscommunication a mitigating action would be to develop clear communication channels between the primary care service and its service users in order to alleviate concerns. For example, you could work with Local Councils, other primary care services, 3rd sector organisations, Community Health Council etc, to help promote further communication to patients to help clarify your proposals and what this will mean to avoid any future misunderstanding and misinterpretation.

6. How does your service promote equality?

The protected characteristics, Welsh Language, Carers and Socio-economic conditions are as follows:

Equality Protected Characteristic

- Age
- Disability
- Gender Reassignment
- Pregnancy and maternity
- Race
- Religion, belief and non-belief
- Sex
- Sexual orientation
- Marriage and civil partnership

Impact on other groups and individuals

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- Welsh Language
- Carers
- People Living in Socio Economic Disadvantage

You should provide details of the procedures you have in place to deal with the specific individual needs of your service users, for example, how is your service accessible to those with a physical disability? How do you promote this accessibility? Does your service have alternative methods for communicating with individuals who have a sensory loss? Do you use interpretation services, emailing and text services for those who are hard of hearing? Do you use interpretation services for individuals whose first language is not English? Is your signage and documentation available in Welsh and English? Do you have any Welsh speaking staff? If you do not have any systems in place to cater for individual needs, you should state how you will mitigate these risks, and outline the actions you will take. You should approach this thinking about the protected groups as a whole but also take into consideration the specific comments received from individuals.

For example, if an individual has made comments on physical access to buildings, you could refer to any mitigating actions that you already have in place, or will put in place to resolve this issue. You should outline any further steps which could take e.g. methods of promoting accessibility to buildings. This could be included under the disability section of the EIA template.

Another example could be how your service deals with service users who have a sensory loss. You should state your intention to work with relevant 3rd sector organisations to introduce and promote available support such as the use of live sign / Relay UK, Type Talk, or establish an email / text system for Deaf/deaf patients. You could also look to source sensory loss awareness training for staff and specialist advice in the future to help improve accessibility to your services for those with sensory loss.

7. Conclusions

You should summarise all of the above and state your intentions whether you wish to continue with your proposed changes or not.

You should summarise what you feel the impact of the proposals will be upon your service users, in particular those who may face additional challenges due to a protected characteristic.

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You should acknowledge any challenges which remain and how you will continue to address them. What impact should the mitigating actions have? How will you improve service delivery?

Did you consider any alternative service change proposals? Could they have had a worst impact upon service users to those which you propose?

You should reinforce your reasons for the proposed changes and outline how you intend to monitor the changes and how it will impact upon your service users in the future. Will you review the situation within a set timescale? Will you continue to monitor the impact the changes have upon those with a protected characteristic? For example, establish a service user stakeholder group? Work with local action groups? Repeat engagement activity at regular intervals? Etc.

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Equality Impact Assessment Template

<u>For:</u>	<i>(Insert title of Service Change Proposal / Strategy / Policy/ Decision etc - (see guidance note reference 1)</i>
<u>Date form completed:</u>	
<u>Completed by:</u>	
Background / Introduction: <i>(see guidance note reference 2)</i>	
Description of the EIA undertaken: <i>(see guidance note reference 3)</i>	
Common Themes: <i>(see guidance note reference 4)</i>	
Lessons Learned / Mitigating Actions <i>(see guidance note reference 5)</i>	

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How does your service promote equality? <i>(see guidance note reference 6)</i>					
Equality Protected Characteristic	Impact				Briefly describe what the impact is, and what steps you can take to address any negative impact
	Will it have an impact		Is the impact positive or negative		
	Yes	No	(+ve)	(-ve)	
Age					
Disability					
Gender Reassignment					
Pregnancy and maternity					
Race					
Religion, belief and non-belief					
Sex					
Sexual orientation					
Marriage and civil Partnership					
Impact on other groups and individuals	Impact				Briefly describe what the impact is, and what steps you can take to address any negative impact
	Will it have an impact		Is the impact positive or negative		
	Yes	No	(+ve)	(-ve)	
Welsh Language					
Carers					
People Living in Socio Economic Disadvantage					
Any other comments, evidence, assessments, or information that relates to the impact of this proposal?					

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Conclusions <i>(see guidance note reference 6)</i>