



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Betsi Cadwaladr
University Health Board

EQUALITY IMPACT ASSESSMENT FORMS

PARTS A (Screening – Forms 1-4) and
B (Key Findings and Actions – Form 5)

<u>For:</u>	Roster Optimisation/Shift changes
<u>Date form completed:</u>	Updated 7 th October 2019



PARTS A: SCREENING and B: KEY FINDINGS AND ACTIONS

Introduction:

These forms have been designed to enable you to record, and provide evidence of how you have considered the needs of all people (including service users, their carers and our staff) who may be affected by what you are writing or proposing, whether this is:

- a policy, protocol, guideline or other written control document;
- a strategy or other planning document e.g. your annual operating plan;
- any change to the way we deliver services e.g. a service review;
- a decision that is related to any of the above e.g. commissioning a new service or decommissioning an existing service.

Remember, the term 'policy' is used in a very broad sense to include "...all the ways in which an organisation carries out its business" so can include any or all of the above.

Assessing Impact

As part of the preparation for your assessment of impact, consideration should be given to the questions below.

You should also be prepared to consider whether there are possible impacts for subsections of different protected characteristic groups. For example, when considering disability, a visually impaired person will have a completely different experience than a person with a mental health issue.

It is increasingly recognised that discrimination can occur on the basis of more than one ground. People have multiple identities; we all have an age, a gender, a sexual orientation, a belief system and an ethnicity; many people have a religion and / or a disability as well. The experience of black women, and the barriers they face, will be different to those a white woman faces. The elements of identity cannot be separated because they are not lived or experienced as separate. Think about:-

- ✓ *How does your policy / proposal promote equality for people with protected characteristics (Please see the General Equality Duties)?*
- ✓ *What are the possible negative impacts on people in protected groups and those living in low-income households and how will you put things in place to reduce / remove these?*
- ✓ *What barriers, if any, do people who share protected characteristics face as a result of your policy / proposal? Can these barriers be reduced or removed?*
- ✓ *Consider sharing your EqIA wider within BCUHB (and beyond), e.g. ask colleagues to consider unintended impacts.*
- ✓ *How have you/will you use the information you have obtained from any research or other sources to identify potential (positive or negative) impacts?*

Part A

Form 1: Preparation

1.	What are you assessing i.e. what is the title of the document you are writing or the service review you are undertaking?	Roster optimisation /Shift Changes
2.	Provide a brief description, including the aims and objectives of what you are assessing.	As there are 100 different shifts the aim is to address inequality and variation in shift patterns and breaks to ensure patient needs and staff wellbeing are effectively and safely met.
3.	Who is responsible for whatever you are assessing – i.e. who has the authority to agree/approve any changes you identify are necessary?	Executive Director, Nursing and Midwifery
4.	Is the Policy related to, or influenced by, other Policies/areas of work?	Nurse Staffing Level policy for adult acute Nurse Staffing Levels (Wales) Act 2016 E-rostering – Safe Care Occupational Health and Safety/Working Time regulations 1998
5.	Who are the key Stakeholders i.e. who will be affected by your document or proposals? Has a plan for engagement been agreed?	All staffing, nursing acute Secondary Care, Community services Consultation has been undertaken in accordance with Organisational Change Policy
6.	What might help/hinder the success of whatever you are doing, for example communication, training etc.?	Communication, formal flexible working arrangements, travel arrangements (public transport)

Part A

Form 1: Preparation

7.	Think about and capture the positive aspects of your policy that help to promote and advance equality by reducing inequality or disadvantage.	<ul style="list-style-type: none">- Safety of shift change over for handover/adequate communication- Effective deployment for safe cover- Wellbeing of staff, standardising breaks ensuring consistency + adequacy for shift duration- Working time directive compliance
----	---	---

Part A

Form 2: Record of potential Impacts - protected characteristics and other groups

Please complete the next section to show how this policy / proposal could have an impact (positive or negative) on the protected groups listed in the Equality Act 2010. *(Please refer to the [Step by Step guidance](#) for more information)* It is important to note any opportunities you have identified that could advance or promote equality of opportunity. This includes identifying what we can do to remove barriers and improve participation for people who are under-represented or suffer disproportionate disadvantage.

Lack of evidence is not a reason for *not assessing equality impacts*. Please highlight any gaps in evidence that you have identified and explain how/if you intend to fill these gaps.

Remember to ask yourself this: If we do what we are proposing to do, in the way we are proposing to do it, will people who belong to one or more of each of the following groups be affected differently, compared to people who don't belong to those groups? i.e. Will they experience different outcomes, simply by reason of belonging to that/those group(s). And if so, will any different outcome put them at a disadvantage?

The sort of information/evidence that may help you decide whether particular groups are affected, and if so whether it is likely to be a positive or negative impact, could include (but is not limited to) the following:-

- population data
- information from EqIAs completed in other organisations
- staff and service users data, as applicable
- needs assessments
- engagement and involvement findings and how stakeholders have engaged in the development stages
- research and other reports e.g. Equality & Human Rights Commission, Office for National Statistics
- concerns and incidents
- patient experience feedback
- good practice guidelines
- participant (you and your colleagues) knowledge

Part A

Form 2: Record of potential Impacts - protected characteristics and other groups

Protected characteristic or group	Will people in each of these protected characteristic groups be impacted by what is being proposed? If so is it positive or negative? (tick appropriate below)				Reasons for your decision (including evidence that has led you to decide this) A good starting point is the EHRC publication: "Is Wales Fairer (2018)?" You can also visit their website here	How will you reduce or remove any negative Impacts that you have identified?
	Yes	No	(+ve)	(-ve)		
Age (e.g. think about different age groups)	✓		✓		<p>Supporting appropriate length of break for shift duration, particularly for long shifts. Providing adequate staffing throughout by limiting the number of handovers and improving safety for staff obtaining robust information at the start of each shift.</p> <p>There are opportunities to explore flexible working arrangements where the proposed changes impact upon personal circumstances</p> <p>The proposal is not stipulating a single shift pattern; there is the option of long shifts / shorter shifts and this is no change from the current arrangements other than the stipulation of the 1hr break and standardising start and finish times for the range of shifts.</p>	
Disability (think about different types of		✓			In addition to the above, we understand the legal requirements around considering reasonable adjustments for disabled staff in	

Part A

Form 2: Record of potential Impacts - protected characteristics and other groups

<p>impairment and health conditions:- i.e. physical, mental health, sensory loss, Cancer, HIV)</p>				<p>accordance with our Guidance (WP27) and our Managing Attendance at Work Policy.</p>	
<p>Gender Reassignment (sometimes referred to as 'Gender Identity' or transgender)</p>		✓		<p>There are opportunities to explore flexible working arrangements where the proposed changes impact upon personal circumstances</p> <p>The proposal is not stipulating a single shift pattern; there is the option of long shifts / shorter shifts and this is no change from the current arrangements other than the stipulation of the 1hr break.</p>	
<p>Pregnancy and maternity</p>		✓		<p>As above: supported by Pregnancy and Maternity Policy with appropriate work place assessment and reasonable adjustment as required</p>	
<p>Race (include different ethnic minorities, Gypsies and Travellers)</p> <p>Consider how refugees and asylum-seekers</p>		✓		<p>There is no evidence that indicates people from different ethnic backgrounds will be affected differently by the rota optimisation proposals.</p> <p>There are opportunities to explore flexible working arrangements where the proposed changes impact upon personal circumstances</p>	

Part A

Form 2: Record of potential Impacts - protected characteristics and other groups

may be affected.						
Religion, belief and non-belief		✓			BCUHB acknowledge the potential impact that different shifts may have on people who have devout religious beliefs. Staff can self roster and in addition, where any staff member has a rota which they feel would impact on their religious belief this should be discussed with the line manager. Flexible working opportunities can be explored whereby any negative impact may be perceived.	
Sex (men and women)	✓		✓		<p>There are opportunities to explore flexible working arrangements where the proposed changes impact upon personal circumstances, for example, where the proposals impact upon childcare responsibilities.</p> <p>The proposal is not stipulating a single shift pattern; there is the option of long shifts / shorter shifts and this is no change from the current arrangements other than the stipulation of the 1hr break.</p> <p>The services are mindful of the age and gender profile within BCUHB. It remains the case that all staff will continue to be supported by all available health and leave policies, including flexible working and it is not expected that the proposed shift patterns have any detrimental effect</p>	
Sexual orientation		✓			There is no evidence that indicates people who identify as lesbian, gay or bisexual will be affected differently by the	

Part A

Form 2: Record of potential Impacts - protected characteristics and other groups

(Lesbian, Gay and Bisexual)					<p>rota optimisation proposals when compare to those who do not.</p> <p>There are opportunities to explore flexible working arrangements where the proposed changes impact upon personal circumstances</p> <p>The proposal is not stipulating a single shift pattern; there is the option of long shifts / shorter shifts and this is no change from the current arrangements other than the stipulation of the 1hr break.</p>	
Marriage and civil Partnership (Marital status)		✓			<p>There are opportunities to explore flexible working arrangements where the proposed changes impact upon personal circumstances</p> <p>The proposal is not stipulating a single shift pattern; there is the option of long shifts / shorter shifts and this is no change from the current arrangements other than the stipulation of the 1hr break.</p>	
Low-income households	✓			✓	<p>The consultative process had identified that the proposal could have the potential to impact pay. This is due to the following factors: to maintain contracted hours over a roster period (mostly full time staff) may require additional shifts during a given period; incurring additional travel to work for the extra shift; cleaning of uniform (however, uniforms are issued on a shift pro rata basis). Therefore there is also the potential for additional child care cover for working parents.</p>	<p>1:1 meetings will give staff who are potentially impacted in relation to pay to discuss alternatives which may include</p> <ul style="list-style-type: none"> • Opportunities to increase/decrease hours; • Vacancies

Part A

Form 2: Record of potential Impacts - protected characteristics and other groups

						<ul style="list-style-type: none">• Bank – flexible/additional working <p>Flexible working opportunities</p> <p>The option is available for staff to work any additional hours that build up due to the shift system, to be worked back in a flexible way during the roster cycle. The roster period will increase from 6 weeks to 12 weeks supporting the planning needs of the staff and services.</p> <p>There is no addition to contracted hours</p>
--	--	--	--	--	--	--

Part A Form 3: Record of Potential Impacts – Human Rights and Welsh Language

Human Rights:

Do you think that this policy will have a positive or negative impact on people's human rights? For more information on Human Rights, see our intranet pages at: <http://howis.wales.nhs.uk/sitesplus/861/page/42166>

The Articles (Rights) that may be particularly relevant to consider are:-

- *Article 2* *Right to life*
- *Article 3* *Prohibition of inhuman or degrading treatment*
- *Article 5* *Right to liberty and security*
- *Article 8* *Right to respect for family & private life*
- *Article 9* *Freedom of thought, conscience & religion*

Will people's Human Rights be impacted by what is being proposed? If so is it positive or negative? (tick as appropriate below)				Which Human Rights do you think are potentially affected	Reasons for your decision (including evidence that has led you to decide this)	How will you reduce or remove any negative Impacts that you have identified?
Yes	No	(+ve)	(-ve)			
	✓				<p>There are opportunities to explore flexible working arrangements where the proposed changes impact upon personal circumstances</p> <p>The proposal is not stipulating a single shift pattern; there is the option of long shifts / shorter shifts and this</p>	

Part A Form 3: Record of Potential Impacts – Human Rights and Welsh Language

					is no change from the current arrangements other than the stipulation of the 1hr break.	
--	--	--	--	--	---	--

Part A Form 3: Record of Potential Impacts – Human Rights and Welsh Language

Welsh Language:

There are 2 key considerations to be made during the development of a policy, project, programme or service to ensure there are no adverse effects and / or a positive or increased positive effect on:

Welsh Language	Will people be impacted by what is being proposed? If so is it positive or negative? (tick appropriate below)				Reasons for your decision (including evidence that has led you to decide this)	How will you reduce or remove any negative Impacts that you have identified?
	Yes	No	(+ve)	(-ve)		
Opportunities for persons to use the Welsh language		✓			Consultation documentation produced in Welsh and each site has access to Welsh speaker. The shift changes should not impact upon services supporting the Welsh Language standards including the provision of Welsh-speaking staff.	
Treating the Welsh language no less favourably than the		✓				

Part A Form 3: Record of Potential Impacts – Human Rights and Welsh Language

English language						
---------------------	--	--	--	--	--	--

Part A Form 4: Record of Engagement and Consultation

Please record here details of any engagement and consultation you have undertaken. This may be with workplace colleagues or trade union representatives, or it may be with stakeholders and other members of the community including groups representing people with protected characteristics. They may have helped to develop your policy / proposal, or helped to identify ways of reducing or removing any negative impacts identified.

We have a legal duty to engage with people with protected characteristics under the Equality Act 2010. This is particularly important when considering proposals for changes in services that could impact upon vulnerable and/or disadvantaged people.

<p>What steps have you taken to engage and consult with people who share protected characteristics and how have you done this? Consider engagement and participatory methods.</p>	<ul style="list-style-type: none"> - Issued consultation documents - On site presentations with additional sessions made available to support access - 1:1 meetings available with Clinical Manager, Senior Nurse & WoD representative - Promotion of events via site huddles - Written information for staff on long term sick and maternity leave - Website hosted FAQ's - Open discussion and feedback with staff side reps - All questions/issue have been discussed with both WoD colleagues & Senior Nurses - FAQs responded to formally
<p>Have any themes emerged? Describe them here.</p>	<p>Concerns regards impact on pay, support to get the breaks indicated, availability of childcare provision, availability of food and refreshments.</p>
<p>If yes to above, how have their views influenced your work/guided your policy/proposal, or changed your recommendations?</p>	<p>FAQ's provided. Encouragement of staff to liaise with their Managers to discuss personal impact and potential 'Flexible working' application.</p>

For further information and help, please contact the Corporate Engagement Team – see their intranet page at:- <http://howis.wales.nhs.uk/sitesplus/861/page/44085>

Part B Form 5: Summary of Key Findings and Actions

1. What has been assessed? (Copy from Form 1)	Roster optimisation/Shift changes
---	-----------------------------------

2. Brief Aims and Objectives: (Copy from Form 1)	As there are 100 different shifts the aim is to address inequality and variation in shift patterns and breaks to ensure patient needs and staff wellbeing are effectively and safely met.
---	---

From your assessment findings (Forms 2 and 3):

3a. Could any of the protected groups be negatively affected by your policy or proposal?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3b. Could the impact of your policy or proposal be discriminatory under equality legislation?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> due to existing policies
3c. Is your policy or proposal of high significance? For example, does it mean changes across the whole population or Health Board, or only small numbers in one particular area?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Part B Form 5: Summary of Key Findings and Actions

<p>4. Did your assessment findings on Forms 2 & 3, coupled with your answers to the 3 questions above indicate that you need to proceed to a Full Impact Assessment?</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input checked="" type="checkbox"/></p>
<p>5. If you answered 'no' above, are there any issues to be addressed e.g. reducing any identified minor negative impact?</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>
<p>6. Are monitoring arrangements in place so that you can measure what actually happens after you</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
<p>Record here the reason(s) for your decision i.e. what did Forms 2 & 3 indicate in terms of positive and negative impact for each characteristic, Human Rights and Welsh Language?</p> <p>Risk assessment would be completed as required. Appropriate adjustments would be made and the flexible working policy is in place to enable staff and managers to explore flexible working arrangements where the proposed changes impact upon personal circumstances.</p>	<p>Record Details: Opportunities to discuss 1:1 Opportunities to increase or decrease hours – vacancies Bank – flexible/additional working Flexible working No addition to contracted hours – not paid breaks</p>	<p>How is it being monitored? HR metrics – retention/turnover/ vacancy rates Exit interviews Eroster reporting metrics</p>

Part B Form 5: Summary of Key Findings and Actions

implement your policy or proposal?		Staff survey PADR
	Who is responsible?	Site and Area Directors of Nursing
	What information is being used?	E.g. will you be using existing reports/data or do you need to gather your own information? Existing reports
	When will the EqIA be reviewed? (Usually the same date the policy is reviewed)	6 months, however the above reports/metrics/monitoring arrangements will be monitored monthly.

7. Where will your policy or proposal be forwarded for approval?	Workforce Improvement Group
--	-----------------------------

8. Names of all parties involved in undertaking this Equality Impact	Name	Title/Role
--	------	------------

Part B Form 5: Summary of Key Findings and Actions

Assessment – please note EqIA should be undertaken as a group activity Senior sign off prior to committee approval:	Debra Hickman	Secondary Care Nurse Director
	Naomi Holder	Site Director of Nursing – YWM
	Alison Griffiths	Site Director of Nursing – YGC
	Mandy Jones	Site Director of Nursing - YG
	John Martin	Head of Workforce, East Locality
	Advice sought from	Mike Townson Senior Equalities Manager
Please Note: The Action Plan below forms an integral part of this Outcome Report		

Action Plan

This template details any actions that are planned following the completion of EqIA including those aimed at reducing or eliminating the effects of potential or actual negative impact identified.

	Proposed Actions	Who is responsible for this action?	When will this be done by?
1. If the assessment indicates significant potential negative impact such that you cannot proceed, please give reasons and any alternative action(s) agreed:	Detailed in the Response to Consultation and delivery plan		

Part B Form 5: Summary of Key Findings and Actions

	Proposed Actions	Who is responsible for this action?	When will this be done by?
2. What changes are you proposing to make to your policy or proposal as a result of the EqIA?	Detailed in the Response to Consultation and delivery plan		
3a. Where negative impacts on certain groups have been identified, what actions are you taking or are proposed to reduce these impacts? Are these already in place?	Detailed in the Response to Consultation and delivery plan		
3b. Where negative impacts on certain groups have been identified, and you are proceeding without reducing them, describe here why you believe this is justified.	Detailed in the Response to Consultation and delivery plan		
4. Provide details of any actions taken or planned to advance equality of opportunity as a result of this assessment.	Detailed in the Response to Consultation and delivery plan		