

Equality Impact Analysis:									
Policy / Project / Function:	Making Experiences Count – Complaints / PALS Policy								
Date of Analysis:	13/03/13								
This Equality Impact Analysis was completed by: (Name and Department)	Mike Napier, Head of Corporate Governance, NHS Hull CCG								
What are the aims and intended effects of this policy, project or function?	<ul style="list-style-type: none"> - To promote a comprehensive and accessible complaints / PALS function. - To enable the simple and effective resolution of a patient's complaint / concern focusing on a positive outcome. - To facilitate the wider sharing of learning from complaints / concerns, where appropriate. 								
Please list any other policies that are related to or referred to as part of this analysis	<ul style="list-style-type: none"> • NHS Hull Freedom of Information Policy (2012) • NHS Hull Commissioning for Quality Strategy (2012) • NHS Hull Being Open Policy (2012) • The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009 • NHS Litigation Authority Risk Management Standards • National Patient Safety Agency (NPSA) Strategy • National Reporting and Learning Service Being Open Process 								
Who does the policy, project or function affect ?	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Employees</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Service Users</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Members of the Public</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Other (List Below)</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table>	Employees	<input checked="" type="checkbox"/>	Service Users	<input checked="" type="checkbox"/>	Members of the Public	<input checked="" type="checkbox"/>	Other (List Below)	<input type="checkbox"/>
Employees	<input checked="" type="checkbox"/>								
Service Users	<input checked="" type="checkbox"/>								
Members of the Public	<input checked="" type="checkbox"/>								
Other (List Below)	<input type="checkbox"/>								
Please Tick ✓									

Equality Impact Analysis:

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

Relevant data can be found in the attached Knowledge Management Toolkit

General	Local demographic information can be found via Hull's https://insight.hullcc.gov.uk/IAS/
Age	<p>The Office for National Statistics (ONS) has estimated Hull's resident age structure for 2007 as 256,900. The estimated GP registered population is approximately 290,000. The estimated population aged 18 and above is approximately 78% which equates to approximately 226,000.</p> <p>From JSNA 2011 refresh Hull has a relatively young population, compared with the rest of England, with a lower percentage of people aged over 50 years and a higher percentage in their early 20s as Hull attracts a lot of students being a University City.</p>
Race	<p>From Hull JSNA (2007) estimates are that black or minority ethnic residents now make up 8.8% of the population, compared to the 2001 Census figure of 3.8%.</p> <p>From IAS (Hull City Council 2009) 28,500 people are in ethnic minority groups or 10.86% of the population.</p>
Sex	<p>Hull; male population 129,700, female population 127,200. Applying these splits to the GP registered population indicates approximately 146,000 males and 144,000 females.</p>
Gender reassignment	<p>Currently there are no national and local statistics available for this protected characteristic.</p> <p>The Health and safety policy takes into account the needs of those who have or are gender reassigning in accordance with the EU workplace regulations as amended and the Wellbeing Policy, both of which should be noted in any Human Resources guidance.</p>
Disability	<p>Joint Strategic Needs Assessment Foundation Profile (2009) suggest that 21.4 per cent of the population of Hull have an illness or disability lasting longer than 12 months which limits activities and 24.8 per cent rate their health as lower than 'good'</p>

Sexual Orientation	There are no statistics for how many LGBT people live within Hull and the East Riding. However, the Government estimates that 5% of the national population are LGBT.
Religion, faith and belief	Hull (IAS) 2001 Census shows that 71.4% of population is Christian. In the East Riding is almost 80% of people are Christian.
Marriage and civil partnership	Hull (IAS) the number of civil partnerships in 2010 was 16.
Pregnancy and maternity	From JSNA 2011 the fertility rate in Hull is significantly lower statistically than national and regional comparisons. The total period fertility rate for Hull in 2007 was 1.77 compared with 1.88 regionally and 1.91 for England.

Equality Impact Analysis:

<p>Is any Equality Data available relating to the use or implementation of this policy, project or function ?</p> <p>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 <i>Protected Characteristics</i> – referred to hereafter as ‘<i>Equality Groups</i>’.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <p>1: Application success rates <i>Equality Groups</i> 2: Complaints by <i>Equality Groups</i> 3: Service usage and withdrawal of services by <i>Equality Groups</i> 4: Grievances or decisions upheld</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p> <p>Provision of relevant equality data has been agreed as part of the future commissioning arrangements for the complaints / PALS service.</p>
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<p>and dismissed by <i>Equality Groups</i></p>	
<p>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</p>	<p>Development has taken place in close consultation with the Patient Relations Team of the Commissioning Support Unit. They have drawn upon their direct experience of working with complainants and some direct insight work undertaken with them.</p>
<p>Promoting Inclusivity</p> <p>How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation</p>	<p>The policy facilitates the direct registering, and subsequent reporting, to the CCG of any concerns which relate to the 9 protected characteristics under the Equality Act from a patient.</p>

Equality Impact 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
Gender (Men and Women)	✓			
Race (All Racial Groups)	✓			
Disability (Mental and Physical)	✓			
Religion or Belief	✓			
Sexual Orientation (Heterosexual, Homosexual and Bisexual)	✓			

Pregnancy and Maternity	✓			
Transgender	✓			
Marital Status	✓			
Age	✓			

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:

Equality Impact Findings:	
Analysis Rating:	 Red Red Amber Green Amber
Red – Stop and remove the policy	<p>Red: 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.</p>
Red Amber – Continue the policy	<p>Red Amber: 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.</p>
Amber – Adjust the Policy	<p>Amber: 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>
Green – No major change	<p>Green: 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>

Other Comments:	
Confirmed by (Manager): (Name and Title)	
Date:	