



**Bedfordshire, Luton
and Milton Keynes**
Integrated Care Board

Equality, Diversity and Inclusion in Employment Policy

Document Control	
Document Owner:	Director of Organisational Development
Document Author(s):	People and Development Team
Directorate:	People Directorate
Approved By:	BLMK ICB Board
Date of Approval:	01-07-2022
Date of Next Review:	30-09-2024
Effective Date:	01-07-2022

Version Control			
Version	Date	Reviewer(s)	Revision Description
Draft v0.1	10-02-2022	Paul Martin – Interim HR Business Partner	First Draft
Final v1.0	01-07-2022	BLMK ICB Board	Approved by The Board
<p>Major revisions to a document are reflected by incrementing the whole number by 1. Minor revisions are reflected by making increments to the decimal number.</p>			

Implementation Plan:

Development and Consultation:	<p>The following individuals were consulted and involved in the development of this document:</p> <ul style="list-style-type: none"> ▪ Equality Unit, AGEM CSU ▪ Director of Organisational Development ▪ People and Development Team ▪ Partnership Forum ▪ Staff Involvement Group
Dissemination:	<p>Staff can access this document via the website and will be notified of new / revised versions via the staff briefing.</p> <p>This document will be included in the organisation's Publication Scheme in compliance with the Freedom of Information Act 2000.</p>
Training:	<p>The following training will be provided to ensure understanding and compliance with this policy:</p> <ul style="list-style-type: none"> ▪ Mandatory e-learning where this is required by the organisation. ▪ Training sessions for managers and staff will be provided where a need is identified and will be delivered using a range of methods.
Monitoring:	<p>Monitoring and compliance:</p> <ul style="list-style-type: none"> ▪ Monitoring and compliance with this policy will be carried out within the People and Development Team with reference to ESR and other workforce information and relevant dashboards. Data will be reported to relevant ICB performance and governance committees as necessary.
Review:	<p>The Document Owner will ensure this document is reviewed in accordance with the Review Date on page 2.</p>
Equality, Diversity and Privacy:	<p>Appendix 1 - Equality Impact Assessment Appendix 2 - Data Protection Impact Assessment</p>
Associated Documents:	<p>The following documents must be read in conjunction with this document:</p> <ul style="list-style-type: none"> ▪ Recruitment and Selection Policy and Procedure ▪ Civility, Dignity and Respect Policy ▪ Grievance Policy and Procedure ▪ Freedom to Speak Up Policy
References:	<p>The following articles were accessed and used to inform the development of this document:</p> <ul style="list-style-type: none"> ▪ Good practice equality, diversity and inclusion training guidance - The NHS Staff Council (year) ▪ Attracting, supporting and retaining a diverse NHS workforce – NHS Employers and the Nuffield Trust

	<p>Improving diversity in recruitment practices in the NHS NHS Employers</p> <ul style="list-style-type: none">▪ Improving staff equality networks through partnership working: A good practice guide Staff Networks▪ Good equality practice for employers: equality policies, equality training and monitoring – Equality and Human Rights Commission▪ Home Page Equality and Human Rights Commission (equalityhumanrights.com)
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Equality, Diversity and Inclusion in Employment Policy – Brief Summary with References to Full Policy Document

Point	Summary	Refer to Section:
1.	This key policy sets out the ICB's aims, aspirations and commitments in relation to equality, diversity, and inclusion in employment. It describes the practical steps the organisation will take in order to build and develop a diverse workforce in which all staff feel valued, included, and able to give their best.	1.4
2.	The ICB Board understands that this will give the organisation the best possible opportunity of achieving its mission to optimise health and wellbeing for our population, advance health equality in our communities and make the best use of NHS resources.	4.1
3.	The policy commits to operating employment policies and practices which ensure that no employee, or potential employee, receives less favourable treatment on the grounds of a protected characteristic (Equality Act, 2010) or additionally trade union membership, offending background, domestic circumstances, social and employment status, HIV status, political affiliation or any other personal characteristic.	4.2
4.	The ICB also commits through this policy and the practical measures outlined to meet its duties as a public sector employer. In all of its employment practices the organisation will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and promote good relations between the groups protected	4.3, 4.4
5.	In addition, the ICB the organisation will make an Equality commitment to its workforce. The organisation will design and implement policies, procedures and commission services that meet the diverse needs of our local population and workforce, ensuring that none are placed at a disadvantage over others.	6.2 Policy toolkit
6.	To oversee and guide the work taking place to achieve the aims of this policy, the ICB will operate an Equality, Diversity and Inclusion (EDI) Committee.	6.1 Policy toolkit
7.	As a further measure to achieve its aims the ICB will work according to a clear set of values and behaviours, which it will promote strongly in support of its mission. All of us are responsible for modelling these values and behaviours at all times.	6.3
8.	The ICB fully supports the view that the moral and legal cases for NHS organisations to increase the diversity and inclusivity of their workforce are undoubted. As such, the ICB will, through its recruitment and employment practices work to achieve workforce diversity at all levels of the organisation,	6.4

	including through the use of positive action where appropriate, as permitted by the Equality Act.	
9.	In line with its values, the ICB will support the establishment and development of staff networks, with the overall aim of improving staff experience. Such networks (or groups of colleagues with a shared heritage, experience or a characteristic) will be supported come together to support each other and work with the organisation to improve staff experience.	6.5
10.	The ICB also understands that a key factor in being able to address discrimination is the ability to monitor progress and benchmark. As such, the organisation will undertake work to achieve a greater understanding of patterns of inequality within its workforce, through analysis of data about the outcome and impact of its employment practices.	6.6
11.	The ICB uses the NHS Workforce Race Equality Standard ('WRES') to monitor and guide its progress in relation to race equality in employment.	6.7
12.	Within its employment policies and practices the organisation also takes a range of steps to make sure that disabled people can access employment and employment opportunities as easily as non-disabled people. The Workforce Disability Equality Standard ('WDES') will also be used to measure progress.	6.8
13.	The organisation encourages its staff to speak up and raise concerns when necessary, and the range of options for doing this are set out.	6.9

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1.0 Introduction

- 1.1 NHS Bedfordshire, Luton and Milton Keynes Integrated Care Board (ICB) aims to ensure robust governance through its formal written procedural documents, such as this document, which communicate standard organisational ways of working. These documents help clarify operational requirements and consistency within day-to-day practice. They can improve the quality of work, increase the successful achievement of objectives and support patient safety, quality and experience. The ICB aims to ensure its procedural documents are user friendly, up-to-date and easily accessible.
- 1.2 The ICB must design and implement procedural documents that meet the diverse needs of our service and workforce, ensuring that none is placed at a disadvantage over others, in accordance with the Equality Act 2010. The Equality Impact Assessment initial screening, which was used to determine the potential impact this policy might have with respect to the individual protected characteristics is incorporated at Appendix 1.
- 1.3 A Data Protection Impact Assessment is a process which helps assess privacy risks to individuals in the collection, use and disclosure of personal information. The Data Protection Impact Assessment initial screening, which was used to determine the potential impact this policy might have with respect to an individual's privacy is incorporated at Appendix 2.
- 1.4 The policy sets out the ICB's aims, aspirations and commitments in relation to equality, diversity, and inclusion in employment. It describes the practical steps the organisation will take in order to build and develop a diverse workforce in which all staff feel valued, included, and able to give their best.

2.0 Scope

- 2.1 This policy applies to all ICB employees, including Ordinary Members of the Board of the ICB, whether permanent or temporary.
- 2.2 The policy also applies to workers who are contracted-in under a contract for service, either as an individual or through a third-party supplier. Such workers are also expected to understand the policy and work in accordance with its principles and practices.
- 2.3 As such, this policy uses the term "staff" throughout, to indicate that the contents are relevant to both employees and workers.

3.0 Definitions and Terms

- 3.1 **Equality** – is about ensuring that every individual has an equal opportunity to make the most of their lives and talents. It is also the belief that no-one should have poorer life chances because of the way they were born, where they come from what they believe, or whether they have a disability. Equality recognises that historically certain groups of people with protected characteristics such as race, disability, sex and sexual orientation have experienced discrimination. (UK Equality and Human Rights Commission).
- 3.2 **Diversity** – is about recognising difference and acknowledging the benefit of having a range of perspectives available to support decision-making, and the workforce being representative of the organisation’s service users. (Chartered Institute of Personnel and Development).
- 3.3 **Inclusion** – where people’s differences are valued and used to enable everyone to thrive at work. An inclusive working environment is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential no matter their background identity or circumstances. (Chartered Institute of Personnel and Development).
- 3.4 **Equality Act 2010** – the Act of Parliament which provides the legal framework for protecting the rights of individuals and advancing equality of opportunity for all, including by providing a discrimination law. It is now the single legal framework for equality, merging nine main pieces of previous legislation.
- 3.5 **‘Protected Characteristic’** – age, disability gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation are known as ‘protected characteristics’ under the Equality Act 2010, and it is against the law to discriminate against someone because of one of these characteristics. There are different types of discrimination:
- 3.6 **Direct Discrimination** - this occurs when a person treats another less favourably than they treat or would treat others because of a protected characteristic. It is generally unlawful.
- 3.7 **Indirect Discrimination** - may occur when an apparently neutral provision or criteria or practice is applied which puts workers sharing a protected characteristic at a particular disadvantage. having one or more of the protected characteristics. In some circumstances if the application of a provision, criteria or practice can be shown to be ‘a proportionate means of achieving a legitimate aim’ it will not amount to indirect discrimination.
- 3.8 **Victimisation** - a person is victimised if they are treated less favourably than others in the same circumstances, because it is suspected or known that they

have brought proceedings under the Equality Act or given evidence or information relating to such proceedings or alleged that discrimination has occurred. Victimisation is unlawful under the Act. Discrimination against an individual, who has brought or contemplated bring an action or made a complaint or given information alleging discrimination or has appeared as a witness, is also forbidden.

- 3.9 **Harassment** - unwanted conduct which is related to one of the following: age, disability, gender reassignment, race, religion or belief, sex and sexual orientation and is therefore unlawful. This includes harassment of a sexual nature and is specifically outlawed by the Equality Act. An individual does not need to possess the relevant characteristic themselves and therefore harassment can be because of their association with a person who has a protected characteristic, or because they are wrongly perceived to have one, or are treated as if they do.

4.0 Policy Statement

“The NHS must welcome all, with a culture of belonging and trust. We must understand, encourage and celebrate diversity in all its forms. Discrimination, violence and bullying have no place. If we do not role model this culture, then how can our patients expect to be treated equitably, and as individuals?”
- We Are The NHS: People Plan 2020/21

- 4.1 NHS Bedfordshire, Luton and Milton Keynes Integrated Care Board (‘the ICB’) understands the importance of having a diverse workforce in which all staff feel valued, included, and able to give their best. The Board understands that this will give the organisation the best possible opportunity of achieving its mission to optimise health and wellbeing for our population, advance health equality in our communities and make the best use of NHS resources.
- 4.2 As such, the ICB’s employment practices, policies and procedures will be designed to ensure that no employee, or potential employee, receives less favourable treatment on the grounds of sex, race, colour, ethnic or national origin, sexual orientation, marital status, religion or belief, age, trade union membership, disability, offending background, domestic circumstances, social and employment status, HIV status, gender reassignment, political affiliation or any other personal characteristic.
- 4.3 The ICB is aware of its responsibilities as a public sector employer under the Equality Act (2010) and will ensure that it meets and wherever possible exceeds these through the range of measures which are set out in this policy.
- 4.4 In the development and application of this policy, and its other employment policies, procedures and practice - and in line with its duty as a public sector organisation - the ICB will have due regard for the need to eliminate unlawful

discrimination, promote equality of opportunity, and promote good relations between the groups protected by the Equality Act (2010).

5.0 Roles and Responsibilities

5.1 ICB Board

- Receive high level information about the application and outcomes of this policy, as necessary, and to provide Board-level guidance and advice, as appropriate.

5.2 Executive Lead or Chief Executive Officer

- Overall responsibility for this policy, including promoting and ensuring best practice in relation to the particular Human Resources issue.

5.3 Line Managers

- Read and understand the contents of this policy and take management action consistent with the organisation's approach.
- Related to the above, apply the policy fairly and consistently, taking into account any issues highlighted in the Equality Impact Assessment at Appendix 1.
- Maintain accurate records of decisions made in relation to the application of this policy.
- Seek advice from the People and Development Team on the application of this policy, as necessary.
- Carry out these responsibilities in accordance with the ICB's Values at all times, and in particular by treating staff with compassion, respecting their differences.
- Keep information about staff confidential and protect the privacy of individuals.

5.4 All Staff

- Read and understand the contents of this policy in order to engage effectively with line managers in relation to the particular area of HR policy and practice.
- Comply with the requirements and processes set out in the policy in order to support the efficient resolution of particular HR issues.
- Engage actively, openly and positively in discussions with line managers and colleagues, in order to resolve any issues or decisions relating to this policy.

- Carry out these responsibilities in accordance with the ICB's Values at all times.
- Keep information about staff confidential and protect the privacy of individuals.

5.5 People and Development Team

- Make staff aware of this policy and how to access it.
- Keep records of decisions made in relation to this policy, in order to monitor its application, and keep under review whether it is being applied fairly and consistently.
- Maintain and update this policy as appropriate to ensure it remains aligned with organisation needs and legislative requirements.
- Provide advice, support, and training to line managers on the application of this policy as necessary, in order to ensure fairness and consistency.
- Provide support to staff on the application of this policy, as appropriate.
- Carry out these responsibilities in accordance with the ICB's Values at all times.
- Keep information about staff confidential and protect the privacy of individuals.

6.0 Processes and Procedures

6.1 Governance to Achieve Workforce Equality, Diversity and Inclusion

- 6.1.1 The ICB will operate an Equality, Diversity and Inclusion (EDI) Committee to oversee and guide the work taking place to achieve the aims of this policy. The Committee has a focus on both health services and the ICB workforce.
- 6.1.2 The Committee will also provide proactive support, evidence-based feedback, guidance, assurance and governance to the Governing Body to enable it to carry out its responsibilities in relation to equality, diversity and inclusion. It will also provide strategic direction, leadership and support for promoting and maintaining equality, diversity and inclusion across the ICB.
- 6.1.3 The People and Development Team, which will be represented on the EDI Committee, will prepare and bring progress and monitoring reports relating to the work taking place to building a diverse workforce in which all staff feel valued, included, and able to give their best. The Committee also includes staff representation, and Staff Network Leads, when in role, will also be invited to attend.

6.1.4 The Committee's terms of reference are available in the Policy Toolkit.

6.2 The ICB Equality Commitment

6.2.1 Following work undertaken in 2021, the ICB will also make an Equality Commitment to its local population and its workforce. In summary, the organisation has committed to design and implement policies, procedures and commission services that meet the diverse needs of our local population and workforce, ensuring that none are placed at a disadvantage over others.

6.2.2 The ICB's Equality Commitment aligns with this policy in respect of the workforce and asks that staff at all levels to take a personal responsibility for the application of the commitment on a day-to-day basis. In summary, this means they should seek to display empathy to colleagues and patients, and wherever possible challenge any acts of discriminatory practice or negative behaviours in the course of their employment.

6.2.3 In addition to all staff, whatever their level, taking responsibility for the achievement of the ICB's equality, inclusion and human rights goals, senior and line managers are asked to accept specific responsibilities in addition to the general responsibilities set out in Section 5 of this and all Human Resource policies.

6.2.4 The ICB's Governing Body will have overall corporate responsibility for ensuring that the ICB complies with their legal and ethical obligations with regard to Equality, Diversity and Inclusion in their dealings with staff, service users, patients, the public and other stakeholders.

6.2.5 ICB managers will hold responsibility for ensuring the practical implementation of the Equality Commitment and for the incorporation of its principles when implementing the organisation's policies and procedures. Managers are expected to positively promote high equality standards, in line with the requirements of the Act in line with the NHS England People Plan.

6.2.6 The ICB's Equality Commitment is in the Policy Toolkit on the Staff Intranet..

6.3 A Values-Based Workforce

6.3.1 The ICB has a clear set of values and behaviours, which it will promote strongly in support of its mission to optimise health and wellbeing for our population, advance health equality in our communities and make the best use of NHS resources.

6.3.2 We want all of our staff to model these values and behaviours at all times and will engage with our workforce to ensure that they are understood, supported, and reinforced, including through the development of knowledge and skills.

6.3.3 In relation to our workforce we will promote understanding of the importance of behaviours which support our values, and in particular:

- Treating our colleagues equally, respecting their differences and understanding their needs
- Listening carefully to those we work with, and valuing different opinions
- Involving our colleagues in decision-making as much as possible
- Fostering a safe culture in which staff can speak up if they are concerned about something
- Keeping and delivering the promises and commitments we make to our colleagues

6.4 A Diverse and Representative Workforce

6.4.1 The ICB fully supports the overall position of NHS Employers (see References) - that the moral and legal cases for NHS trusts to increase the diversity and inclusivity of their workforce are indisputable. There is a robust body of evidence which demonstrates the benefits, including: improved quality of care for patients; a more sustainable workforce supply; and increased efficiency of services.

6.4.2 As such, the ICB will, through its recruitment and employment practices work to achieve workforce diversity at all levels of the organisation. In relation to recruitment and selection, the organisation's policy commits to taking positive action where appropriate, through a range of practical interventions. This includes prioritising applications from under-represented groups where in particular circumstances.

6.4.3 Where local equality demographic data (i.e. in relation to the workforce and local population) highlights equality groups which are under-represented within the role and staff group being advertised, the ICB will consider the use of positive action measures. These will range from encouraging people from particular groups to apply, to supporting the development of particular groups within the workforce.

6.5 Living Our Values by Supporting Staff Networks

6.5.1 The ICB will support the establishment and development of staff networks, with the overall aim of improving staff experience. As defined by NHS Employers, staff networks are "a group of colleagues, often with a shared heritage, experience or a characteristic, that come together to support each other and work with the organisation to improve staff experience" and the ICB strongly supports the establishment of networks for this purpose.

- 6.5.2 The ICB is aware of research carried out by the NHS Staff Council which shows that staff networks make possible a range of important functions and activities, all of which the ICB would benefit from. These include: providing a safe space for staff to raise concerns and receive peer support in relation to those; providing a forum for staff to discuss their experience at work in the context of relevant surveys and data, such as NHS Staff Survey results, Workforce Race Equality Standard (WRES) monitoring, to provide feedback and support action planning and policy development for addressing known areas of concern; and providing opportunities for learning and development.
- 6.5.3 Staff networks exist in many different forms across NHS and other organisations in the public, private, third sectors, and following its inception the ICB will undertake work to establish an appropriate and effective framework for supporting networks in our context.
- 6.5.4 This will be in addition to the organisation's general partnership principles, which already include a Staff Involvement Group (SIG) and a partnership forum with recognized trade unions. It is acknowledged that both forums have a strong interest in equality, diversity and inclusion, and will be able to contribute to the organisation's work.

6.6 Monitoring for Equality, Diversity and Inclusion

- 6.6.1 The ICB supports the position that a key factor in being able to address discrimination is the ability to monitor progress and benchmark. As such, the organisation will undertake work to achieve a greater understanding of patterns of inequality at regional, system, and local level within its workforce.
- 6.6.2 In relation to its own workforce, the ICB, through its People and Development Team, will undertake monitoring to establish whether it is achieving equality, diversity and inclusion, including (but not limited to):
- The composition of its workforce at all levels, compared to relevant labour market and local population data.
 - The outcome of recruitment and selection processes, including the success rates of people with different protected characteristics at the shortlisting and appointment (interview) stages.
 - The outcomes of its other employment policies and practices, including: appraisal and personal development review, management of conduct and work performance, wellbeing and attendance management, and the policies which support staff to raise concerns.

- NHS staff survey indicators which relate to equality, diversity and inclusion, such as the proportions of staff from particular groups reporting issues such as bullying, harassment and victimisation.

6.6.3 Following the inception of the ICB, the People and Development Team will undertake work to develop a set of monitoring reports and schedule, which will be presented to the Equality, Diversity and Inclusion Committee for discussion and guidance.

6.6.4 Section 6.7 below provides specific detail about the Workforce Race Equality Standard, which the ICB is committed to using to measure and monitor progress.

6.7 Meeting Workforce Race Equality Standards

6.7.1 The Workforce Race Equality Standard ('WRES') for the NHS was introduced in 2015 and requires NHS providers to show progress against a number of indicators of workforce race equality.

6.7.2 The ICB is not a provider organisation but is committed to using and applying the standards, monitoring progress over time, and reporting back to the workforce.

6.7.3 The People and Development Team will prepare an annual WRES Report for consideration by the ICB's Equality, Diversity and Inclusion Committee. Where Issues are identified e.g. a deterioration in relation to the indicators, a proactive Action Plan will be developed and implemented.

6.7.4 Progress will be reported back to staff through the relevant Staff Network (see Section 6.5) and Communications bulletins and briefings. Staff will be encouraged to contribute feedback and co-produce the organisation's plans by putting forward ideas and suggestions.

6.8 Meeting Our Duty to Disabled People

6.8.1 The ICB understands its duty under the Equality Act to make sure that disabled people can access employment and employment opportunities as easily as non-disabled people. As such the organisation is committed to making reasonable adjustments as and when necessary, as part of its employment practices.

6.8.2 In relation to its Recruitment and Selection Policy and practices the ICB commits to making adjustments, wherever reasonable, to make it possible for disabled people to participate fully in the recruitment process. The ICB also guarantees

an interview to any disabled job applicant who meet essential shortlisting criteria.

- 6.8.3 in relation to its Wellbeing and Attendance Management Policy, the requirement to make reasonable adjustments, where reasonable, and with appropriate specialist advice, is strongly emphasised.
- 6.8.4 The ICB, through its line managers will also be sensitive to the needs of disabled staff in the management of any work performance issues.
- 6.8.5 In general, the ICB prioritises engagement between managers and staff in relation to wellbeing and health, including by mandating regular wellbeing conversations. In these and other regular conversations, the need for adjustments to the working environment, job role, or technologies may be discussed in order to make sure that disabled staff can thrive in the organisation.
- 6.8.6 In addition, whilst it is not a requirement for ICBs, the organisation will use the NHS Workforce Disability Equality Standard ('WDES') to measure its progress. The WDES consists of ten specific measures (metrics) which will enable the ICB to compare the workplace and career experiences of disabled and non-disabled staff.

6.9 Complaints Procedures and Support for Staff

- 6.9.1 Staff who feel that they have been discriminated against in relation to their employment or engagement with the ICB are asked to raise their concerns with their line manager in the first instance and to seek resolution informally. Where an employee's concerns relate to their line manager, the employee should raise their concern with the next most senior member of their reporting line.
- 6.9.2 Where resolution cannot be achieved through informal discussion, or informal resolution is not appropriate in the circumstances, staff may raise a Grievance in line with the ICB Grievance Policy and Procedure. Alternatively, and especially in cases of alleged bullying, harassment or victimisation, the ICB Civility, Dignity and Respect at Work Policy may be followed.
- 6.9.3 The ICB's Freedom to Speak Up Policy may be followed where staff have wider concerns about unfair or discriminatory practices e.g. they believe that a group of staff with a particular protected characteristic are affected by a particular policy or employment practice or criteria.
- 6.9.4 Staff are also invited to discuss their concern with a member of the People and Development Team, their trade union representative, or the Equality, Diversity and Inclusion lead in order to discuss the most helpful way forward in the

circumstances. Staff Network leads will also be able to provide useful advice and support.

6.9.5 The Equality and Human Rights Commission provides a helpline for employees who believe they have experienced discrimination or need information, advice and support on equality and human rights issues. The helpline number is: 0808 800 0082.

6.9.6 Finally, it is recognised that experiencing discrimination is often distressing, and staff are therefore encouraged to seek support from the ICB's Employee Assistance Programme if necessary.

6.10 Data Privacy

6.10.1 BLMK Integrated Care Board (ICB) collects and processes personal information, or personal data, relating to its employees, other workers, contractors and volunteers to manage the working relationship. This personal information may be held by the ICB on paper or in electronic format.

6.10.2 The ICB is committed to being transparent about how it handles personal information, to protecting the privacy and security of personal information and to meeting its data protection obligations under the UK General Data Protection Regulation (UKGDPR) and the Data Protection Act 2018.

6.10.3 As such the ICB has published a Staff Privacy Notice, the purpose of which is to make all workers aware of how and why we will collect and use personal information both during and after the working relationship with the ICB ends. The Staff Privacy Notice can be found on the Staff Intranet pages.

Appendix 1 - Equality Impact Assessment Initial Screening

Please answer the questions against each of the protected characteristic and inclusion health groups. If there are significant impacts and issues identified a full EQIA must be undertaken. For support and advice on undertaking EQIAs please contact: agcsu.equalities@nhs.net

Name of Policy:	Equality, Diversity and Inclusion in Employment Policy
Date of Initial Screening	3 rd March 2022

Protected characteristic and inclusion health groups	Could the policy create a disadvantage for some groups in application or access? (if yes, give a brief summary of the possible disadvantages)	If yes - are there any mechanisms already in place to mitigate the potential disadvantage identified? If not, please detail the additional actions that will be put in place. If this is not possible please explain why (e.g. Agenda For Change requirements)
Age A person belonging to a particular age (for example 32 year olds) or range of ages (for example 18 to 30 year olds).	This policy is specifically designed to achieve 'ED&I' in relation to all groups protected under the Equality Act, as well as a number of other groups. No disadvantage in application or access is anticipated, but see 'Monitoring' (below).	
Disability A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.	As above	
Gender reassignment The process of transitioning from one gender to another.	As above	
Marriage and civil partnership Marriage is a union between a man and a woman or between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'.	As above	
Pregnancy and maternity Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the	As above	

non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.		
Race Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.	As above	
Religion or belief Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	As above	
Sex A man or a woman.	As above	
Sexual orientation Whether a person's sexual attraction is towards their own sex, the opposite sex, to both sexes or none.	As above	
Carers Individuals within the CCG which may have carer responsibilities.	As above	

Please summarise the improvements which this policy offers compared to the previous version or position

As well as committing the organisation to meet its obligations and duties under the Equality Act 2010, it also sets out a range of practical and concrete measures that will be taken to achieve workforce equality, diversity and inclusion.

How will the implementation and impact of the policy be monitored and reviewed, and by whom?

The People and Development Team will establish a set of monitoring indicators in addition to those already in place (e.g. the WRES) and those outlined in the EQIA screenings for other employment policies.

Timetable for monitoring, with dates?
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At least annually, starting with 12 months after approval.
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Initial Screening undertaken by:

Name	Paul Martin
Position	Interim HR Business Partner

N.B. A Full EQIA will be undertaken in relation to this policy, with the aim of ensuring that it is likely to achieve the positive impacts it commits to

Appendix 2 - Data Protection Impact Assessment Initial Screening

DPIA Reference Number	This will be added by the IG Department
Project Title	Equality, Diversity and Inclusion in Employment Policy
Project reference number if you have one	HR11
Team/Department/Service	People and Development Team
Implementing Organisation	BLMK ICB
Name of Project Lead	Emma Richards
Job title of Project Lead	Head of People and Development
Telephone No. & Email Address of Project Lead	Email: emma.richards12@nhs.net Mob: 07770816219
Your name	Paul Martin
Your Role	Interim HR Business Partner
Your Telephone No. & Email Address	Tel. 07789 082358 paul.martin39@nhs.net
Please provide an overview of the project and what it aims to achieve...	
To set out the ICB's aims and aspirations in relation to equality, diversity and inclusion in employment, and the practical steps it will take to achieve its aims.	

Screening Questions

1. Will the project result in the processing of personal identifiable information/data? <i>This includes information about living or deceased individuals, including their name, address postcode, email address, telephone number, payroll number etc.</i>	Yes (in some cases)
2. Will the project result in the processing of sensitive information? <i>This includes for living or deceased individuals, including their physical health, mental health, sexuality, sexual orientation, religious belief, National Insurance No., political interest etc.</i>	Yes (in some cases)
3. Will the project involve the sharing of identifiers which are unique to an individual or household? <i>e.g. Hospital Numbers, NHS Number, National Insurance Numbers, Payroll Number etc.</i>	No
4. Will the project result in the processing of pseudonymised information by organisations who have the key/ability to reidentify the information? <i>Pseudonymised data - where all identifiers have been removed and replaced with alternative identifiers that do not identify any individual. Re-identification can only be achieved with knowledge of the re-identification key. Anonymised data - data where all identifiers have been removed and data left does not identify any patients. Re-identification is remotely possible, but very unlikely.</i>	No

5. Will the project result in organisations or people having access to information they do not currently have access to?	No
6. Will the project result in an organisation using information it already holds or has access to, but for a different purpose?	Yes
7. Does the project result in the use of technology which might be perceived as being privacy intruding? <i>e.g. biometrics, facial recognition, CCTV, audio recording etc.</i>	No
8. Will the project result in you making decisions or taking action against individuals in ways which could have a significant impact on them? <i>Including profiling and automated decision making. (This is automated processing of personal data to evaluate certain things about an individual i.e. diagnosis and then making a decision solely by automated means - without any human involvement)</i>	No
9. Will the project result in the collection of additional information about individuals in addition to what is already collected/held?	No
10. Will the project require you to contact individuals in ways which they may not be aware of and may find intrusive? <i>e.g. personal email, text message etc.</i>	No
11. Will the project result in data being stored in 'the cloud'? <i>E.g. in a location other than a local fileserver, such as Microsoft OneDrive, Google Cloud, or Similar.</i>	No

If you answered 'No' to all of the questions above, your project does not need a DPIA. However, you MUST send this form to the IG Department to assess and to record that the need for a DPIA has been considered. Please forward this form to blmkccg.ig@nhs.net

If you have answered 'Yes' to any of the questions above, you must carry out a DPIA using the Stage 2 DPIA form. This is available on the IG pages of the BLMK Staff Intranet or by contacting the IG Department blmkccg.ig@nhs.net

LIST OF ADDITIONAL DOCUMENTS AVAILABLE WITHIN POLICY TOOLKIT

Appendix 3 – Equality, Diversity and Inclusion Committee Terms of Reference

Appendix 4 – Workforce Race Equality Standard

Appendix 5 – ICB Equality Commitment

Appendix 6 – Workforce Disability Equality Standard