Appendix 2 - Equality Impact Assessment - Standard Assessment Template

Section A: Assessment

Name of Policy: INFECTION CONTROL PROCEDURE FOR METICILLIN RESISTANT STAPHYLOCOCCUS AUREUS (MRSA) IN ACUTE HOSPITALS

Person/persons conducting this assessment with Contact Details:

Faye Mortlock
CNS Infection Prevention & Control Department
University Hospital of Wales, Heath Park, Cardiff, CF14 4XW

Date: 21/10/2014

1. The Policy

Is this a new or existing policy? - It is an update to an existing policy.

What is the purpose of the policy? To provide a structure and appropriate advice to staff for the prevention and management of MRSA at all UHB locations.

To provide advice on action required during an infectious incident or outbreak situation caused by MRSA.

How do the aims of the policy fit in with corporate priorities? i.e. Corporate Plan

To reduce the incidence of HCAI ensuring the delivery of safe, effective care and best outcomes for patients.

To ensure that health board staff have the appropriate advice in the management of patients known or suspected to have MRSA.
Who will benefit from the policy?

Patients and UHB staff.

What outcomes are wanted from this policy?

Cardiff And Vale UHB accepts its responsibility under the Health and Safety at Work Act etc. 1974 and the Control of Substances Hazardous to Health Regulations 2002, to take all reasonable precautions to prevent exposure to MRSA in patients, staff and other persons working at or using its premises.

In order to prevent the possible spread of MRSA amongst patients and staff it is recognised that the UHB requires a procedural document to ensure effective management of infection. This is especially necessary in the case of an infectious incident/outbreak, as detailed in the UHB Infection Control Procedure for Infectious Incidents and Outbreaks.

Are there any factors that might prevent outcomes being achieved? (e.g. Training/practice/culture/human or financial resources)

The necessary resources for the management, training, risk assessments, monitoring and auditing of MRSA infections are already in place and the implementation of this procedure will not entail additional expenditure.

Mandatory Infection and Prevention and Control training updated every year.
Further departmental based training as identified by training needs analysis.
2. Data Collection

What qualitative data do you have about the policy relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population)?

There was no specific equalities data available.

What quantitative data do you have on the different groups (e.g. findings from discussion groups, information from comparator authorities)?

There was specific equalities data available.

Please indicate the source of the data gathered? (e.g. Concerns/Service/Department/Team/Other)
What gaps in data have you identified? (Please put actions to address this in your action plan?)

Google search dated the 21/10/14 showed several EQIA undertaken in to the management of MRSA, all finding no negative impact


https://www.google.co.uk/url?sa=t&source=web&cd=1&ved=0CCoQFjAE&url=https://www.nuh.nhs.uk/handlers/downloads.ashx%3Fid%3D16210&rct=j&frm=1&q=&esrc=s&sa=U&ei=i1IGVKu1BOO17gb-pYD4Cg&ved=0CCoQFjAE&usg=AFQjCNEQjBiLiIN964sCAslRI_TYB0aZmw

3. Impact

Please answer the following
Consider the information gathered in section 2 above of this assessment form, comparing monitoring information with census data as appropriate (see www.ons.gov.uk Office National Statistics website) and considering any other earlier research or consultation. You should also look at the guidance in Appendix 1 with regard to the protected characteristics stating the impact and giving the key reasons for your decision.
Do you think that the policy impacts on people because of their age? (This includes children and young people up to 18 and older people)

No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their caring responsibilities?

No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their disability? (This includes Visual impairment, hearing impairment, physically disabled, Learning disability, some mental health issues, HIV positive, multiple sclerosis, cancer, diabetes and epilepsy.)

We found no evidence of any impact.

Do you think that the policy impacts on people because of Gender reassignment? (This includes Trans transgender and transvestites)

No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their being married or in a civil partnership?

No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their being pregnant or just having had a baby?

No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their race? (This includes colour, nationality and citizenship or ethnic or national origin such as Gypsy and Traveller Communities.)
No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their religion, belief or non-belief? (Religious groups cover a wide range of groupings the most of which are Buddhist, Christians, Hindus, Jews, Muslims, and Sikhs. Consider these categories individually and collectively when considering impacts)

No impact. This policy applies to all equally.

Do you think that the policy impacts on men and woman in different ways?

No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their sexual orientation? (This includes Gay men, heterosexuals, lesbians and bisexuals)

No impact. This policy applies to all equally.

Do you think that the policy impacts on people because of their Welsh language?

The Procedure is in English and therefore has a low impact on the Welsh Language.

4. Summary.
Which equality groups have positive or negative impacts been identified for (i.e. differential impact).
Is the policy directly or indirectly discriminatory under the equalities legislation?
If the policy is indirectly discriminatory can it be justified under the relevant legislation?

We consider there to be no differential impact found. This policy applies to all relevant staff equally
Appendix 3
Cardiff and Vale University Health Board
Action Plan

Section B: Action
5. Please complete your action plan below. Issues you are likely to need to address include
• What **consultation** needs to take place with equality groups (bearing in mind any relevant consultation already done and any planned corporate consultation activities?)
• What **monitoring**/evaluation will be required to further assess the impact of any changes on equality target groups?

**Equalities Impact Assessment Implementation Mitigation/Action Plan**

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<th>Action Required</th>
<th>Timescale for completion</th>
<th>Action Taken</th>
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6. Report, publication and Review
Please record details of the report or file note which records the outcome of the EQIA together with any actions / recommendations being pursued (date, type of report etc)

Please record details of where and when EQIA results will be published

VIA CARDIFF & VALE UHB INTRANET
Please record below when the EQIA will be subject to review.

MARCH 2017

Name of person completing:

Faye Mortlock, Clinical Nurse Specialist, IP&C

Date: 21/10/14

Name of Responsible Executive/Clinical Board Director Authorising Assessment and Action Plan for publication:

Yvonne Hyde, Senior Nurse, IP&C

Date:
22/10/14
Appendix 4
Format for publication of EQIA results

Executive Summary
This should provide a summary of the results of the EQIA, in particular focusing on how any decisions have been made.

Background
• A description of the aims of the policy
• The context in which the policy operates
• Who was involved in the EQIA?

The scope of the EQIA
• A brief account of how you assessed the likely effects of the policy
• The data sources and information used
• The consultation that was carried out (who with, how and a summary of the responses).

Key findings
• Describe the results of the assessment (based on the information that is included in the EQIA template).
• Identify any positive, negative or neutral impact for any equalities groups.

Recommendations
• Provide a summary of the overall conclusions
• State any recommended changes to the proposed policy as a result of the EQIA and plans for implementation/monitoring/ review.
Appendix 5

Glossary of terms
For specific legislative guidance (relating to age, disability, gender, race, religion and belief, sexual orientation) refer to the Equality pages on the intranet

Adverse Impact
This is a significant difference in patterns of representation or outcomes between equalities groups, with the difference amounting to a detriment for one or more equalities groups.

Differential Impact
Suggests that a particular group has been affected differently by a policy, in either a positive, or negative way

Definition of Disability
The Equality Act 2010 defines Disability as being:
“An impairment, which has a substantial, long term adverse effect on a person’s ability to carry out normal day-to-day activities”.

Discrimination
Direct Discrimination
Treating people less favourably than others e.g. on the grounds of age, disability, gender, race, religion and belief, sexual orientation.

Indirect Discrimination
Applying a provision, criterion or practice that disadvantages people e.g. on the grounds of age, disability, gender, race, religion and belief, sexual orientation, and that can’t be justified as a proportionate means of achieving a legitimate aim. The concept of 'provision, criterion or practice' covers the way in which an intention or policy is actually carried out, and includes attitudes and behaviour that could amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and stereotyping. To find discrimination it will be sufficient to show that a practice is likely to affect the group in question adversely.

Diversity
This is defined as how differences between people are harnessed to drive forward creativity and excellence in performance. In the workplace this means recognising individual and group differences, which means more creativity and continuous improvement.

Ethnic monitoring
A process for collecting, storing and analysing data about individuals' ethnic or racial background and linking this data and analysis with planning and implementing policies.

Functions
The term function is intended to encompass the full range of the UHB’s duties and powers, which includes clinical and corporate services and departments.

**Harassment**
This is unwanted conduct that has the purpose or effect of creating a negative or offensive environment for a complainant, or violating the complainant’s dignity or treating a person less favourably than another person because they have either submitted to, or did not submit to, sexual harassment or harassment related to sex or gender reassignment.

**Policies**
The term policy means the full range of formal and informal decisions made in carrying out a function or delivering a particular service. Policies may take the form of a clear written statement, or may be implicit in management decisions or “custom” and “practice”. Policies may also take the form of a strategy, scheme and other functions as described on page of this document.

**Qualitative data**
Information gathered from individuals about their experiences. Qualitative data usually gives less emphasis to statistics.

**Quantitative data**
Statistical information in the form of numbers normally derived from a population in general or samples of that population. This information is often analysed using descriptive statistics, which consider general profile distributions and trends in the data, or using inferential statistics, which are used to determine significance within relationships of differences in the data.

**Race**
Under the Equality Act it is unlawful to discriminate against anyone on grounds of race, colour, nationality, including citizenship or ethnic or national origin and Gypsy and Traveller Communities.

**Reasonableness, Proportionality and Relevance**
These require a professional analysis and judgement that takes account of statutory requirements alongside legal guidance plus the factors listed in section one. In terms of the legislation, relevant means ‘having implications for, or affecting, the promotion of equality’. The UHB has broadened this to include all areas of antidiscrimination law, such that relevance refers to ‘having negative implications for or affecting people from any equality target group mentioned throughout the EQIA.

**Religion, belief & non belief**
Religious groups cover a wide range of groupings the most of which are Buddhist, Christians, Hindus, Jews, Muslims, and Sikhs. Consider these categories individually and collectively when considering impacts.

**Trans communities**
Transgender/transsexual person: a person whose perception of their own gender (gender identity) differs from the sex they were assigned at birth.
A Transvestite will dress as a member of the opposite sex but doesn’t have feelings of belonging to the opposite sex or alienation from their own bodies. Source: www.herts.ac.uk/services/counselling/understanding_gender_dysphoria.pdf

Gender reassignment: the process of transitioning from the gender assigned at birth to the gender the person identifies with. This may involve medical and surgical.

**Victimisation**
This takes place where one person treats another less favourably because he or she has asserted their legal rights in line with the Act or helped someone else to do so.
A QUICK GUIDE TO EQUALITY IMPACT ASSESSMENT

Undertaking an Equality Impact Assessment (EQIA) is not optional. The organisation has a statutory duty to demonstrate it is meeting the requirements of the Human Rights Act 1998 and the 2010 Equality Act by demonstrating ‘due regard’ to eliminating discrimination, promoting equality and fostering good relations.

What are equality impact assessments?
EQIA is a process which enables an organisation to consider the evidence and effects of its decisions, policies, practices and services on different communities, individuals or groups. All public sector bodies currently have a legal duty to undertake equality impact assessment (EQIA) in regard to the ‘protected characteristics’ of race, sex, gender-re-assignment, disability, religion/belief, sexual orientation, pregnancy & maternity, marriage & civil partnership and age. We have also included Welsh Language and human rights issues as part of our EQIA process.

EQIAs provide a systematic method of ensuring that legal, social and moral obligations are met and a practical means of examining new and existing policies, services and practices to determine what impact they may have on inequality for those affected by the outcomes. The need for collection of evidence to support decisions and for engagement and involvement mean that EQIA is most effectively conducted as an integral part of policy development (ref. Policy for the Management of Policies, Procedures and other Written Control Documents).

The process of EQIA involves using a toolkit approach:--
• anticipating or identifying the evidence of the consequences of our work with individuals or groups of patients/carers/families/employees; and other stakeholders
• making sure that any negative effects are eliminated or minimised;
• maximising opportunities for promoting positive effects.

It is a crucial tool in helping us to improve the quality of local health services and to meeting the needs of those who use them as well as our employees. By using equality impact assessment and an evidence based approach we will be ensuring that key strategic and operational decisions around finance, service planning and delivery effectively take account of the diverse needs of our communities and staff.

Training sessions on undertaking EQIA’s and on equality, diversity and human rights also available on the Equality Intranet pages

When do we undertake EQIA?
The purpose of EQIA is to ensure equality considerations are taken into account as part of the decision making and policy development process. It is therefore important that the assessment takes place as early as possible during these processes and is not considered as an additional task to be undertaken after the policy has been developed or as a means of justifying
decisions that have already been made. EQIA means evidence based policy development, not policy-based evidence gathering.
Steps to be followed when undertaking an EQIA - Flowchart

Download Equality Impact (EQIA) Toolkit from the Equality Intranet pages when first thinking of or reviewing ‘policy, service change or decision making’

Establish a group to undertake EQIA initial assessment of relevance and priority. At least 2 people to be involved

Follow EQIA Toolkit to write or review/prioritise policy, service change or decision making’.

Advice if needed from Equality Manager on 02920 742267

Do you have enough data? Indicate further work required

Yes

Answer fully all impact assessment on all groups that are or can be affected. Complete Action Plan

No

Policy, service change or decision making is reviewed and developed in such a way as to minimise discrimination

Completed EQIA to be submitted with ‘policy or other written control' document for approval by appropriate Group or Committee

Following approval of policy/written control document copy sent to Governance and Risk Manager with approved document for uploading onto Intranet and Internet sites. Also to Equality Manager who will arrange external publication
References


http://www.equalityhumanrights.com/uploaded_files/Wales/PSED_Wales_docs/5._psed_wales_equality_information.pdf

EHRC - The essential guide to the public sector equality duty: An overview for listed public authorities in Wales.

EHRC - Engagement: A guide for listed public authorities in Wales.


EHRC - Equality information: A guide for listed public authorities in Wales.

EHRC - Making fair financial decisions.

Central Services Agency - The easy way to EqIA.

NHS Health Scotland - Five essentials to plan for an effective impact assessment.

National Principles for Public Engagement in Wales: www.participationcymru.org.uk

WLGA - The role of Overview and Scrutiny in Assessing Equality Performance.

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