

**NAME OF POLICY**

**MONTH / YEAR**

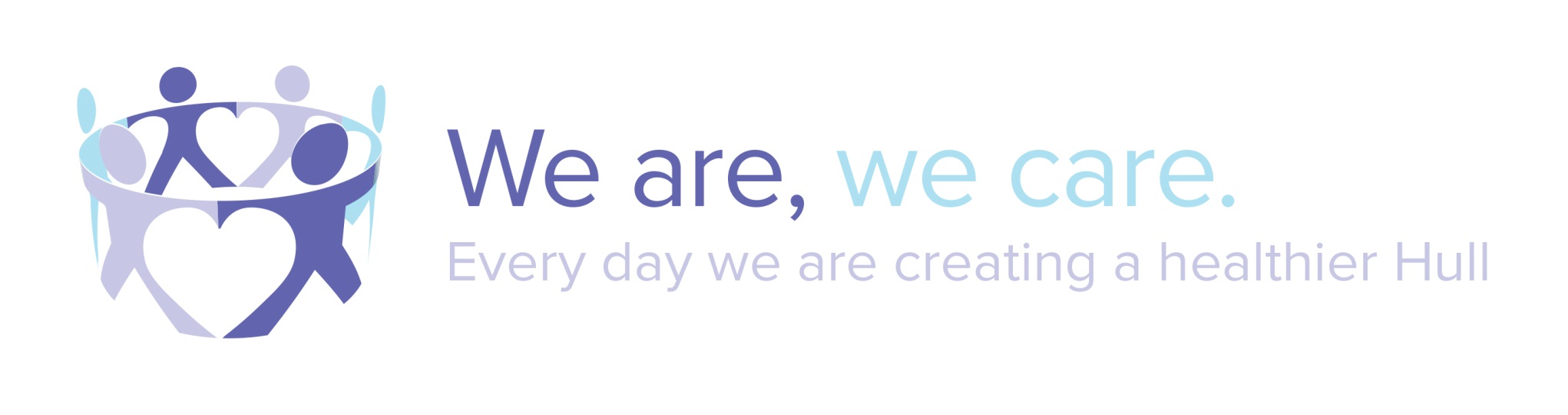
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| --- | --- |
| Name of Policy: |  |
| Date Issued: |  |
| Date to be reviewed: |  |

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| --- | --- | --- | --- |
| **Policy Title:** | |  | |
| **Supersedes: (Please List)** | |  | |
| **Description of Amendment(s):** | |  | |
| **This policy will impact on:** | |  | |
| **Policy Area:** | |  | |
| **Version No:** | |  | |
| **Author:** | |  | |
| **Effective Date:** | |  | |
| **Review Date:** | |  | |
| **Equality Impact Assessment Date:** | |  | |
| **APPROVAL RECORD** |  | | **Date:** |
|  |  | |  |
|  |  | |  |
| **Consultation:** |  | |  |
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**1. INTRODUCTION**

**2. SCOPE**

**3. POLICY PURPOSE AND AIMS**

**4. IMPACT ANALYSIS**

4.1 **Equality**

The CCG is committed to:

4.2 **Bribery Act 2010**

NHS Hull Clinical Commissioning Group has a responsibility to ensure that all staff are made aware of their duties and responsibilities arising from The Bribery Act 2010.

The Bribery Act 2010 makes it a criminal offence to bribe or be bribed by another person by offering or requesting a financial or other advantage as a reward or incentive to perform a relevant function or activity improperly performed. The penalties for any breaches of the Act are potentially severe. There is no upper limit on the level of fines that can be imposed and an individual convicted of an offence can face a prison sentence of up to 10 years.

For further information see <http://www.justice.gov.uk/guidance/docs/bribery-act-2010-quick-start-guide.pdf>.

If you require assistance in determining the implications of the Bribery Act please contact the Local Counter Fraud Specialist on telephone number 01482 866800 or email at [nikki.cooper1@nhs.net](mailto:nikki.cooper1@nhs.net).

Due consideration has been given to the Bribery Act 2010 in the development of this policy (or review, as appropriate) of this policy document and no specific risks were identified. (If this is not particularly relevant to this policy)

**5. NHS CONSTITUTION**

5.1 The CCG is committed to:

5.2 This Policy supports the NHS Constitution and

**6. ROLES / RESPONSIBILITIES / DUTIES**

6.1 **Lead**

6.2 **Employees**

6.3 **Line Manager**

**7. IMPLEMENTATION**

**8**. **TRAINING AND AWARENESS**

**9.** **MONITORING AND EFFECTIVESNESS**

The effectiveness of this Policy will be monitored by

**10. POLICY REVIEW**

This Policy will be reviewed within from the date of implementation.

**11. REFERENCES**

**12. ASSOCIATED DOCUMENTATION**

**APPENDICES**



**Please refer to the EIA Overview & Navigation Guidelines located in *Y:\HULLCCG\Corporate Templates and Forms\Equality and Diversity Information* before completing your EIA)**

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| **HR / Corporate Policy Equality Impact Analysis:** | |
| **Policy / Project / Function:** |  |
| **Date of Analysis:** |  |
| **Completed by:**  **(Name and Department**) |  |
| **What are the aims and intended effects of this policy, project or function?** |  |
| **Are there any significant changes to previous policy likely to have an impact on staff / other stakeholder groups?** |  |
| **Please list any other policies**  **that are related to or referred to as part of this analysis** |  |
| **Who will the policy, project or function affect?** |  |
| **What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?** |  |
| **Promoting Inclusivity and Hull CCG’s Equality Objectives.**  How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation?  How does the policy promote our equality objectives:   1. Ensure patients and public have improved access to information and minimise communications barriers 2. To ensure and provide evidence that equality is consciously considered in all commissioning activities and ownership of this is part of everyone’s day-to-day job 3. Recruit and maintain a well-supported, skilled workforce, which is representative of the population we serve 4. Ensure the that NHS Hull Clinical Commissioning Group is welcoming and inclusive to people from all backgrounds and with a range of access needs |  |

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| **Equality Data** | |
| **Is any Equality Data available**  **relating to the use or**  **implementation of this policy,**  **project or function?**    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 *Protected Characteristics* – referred to hereafter as *‘Equality Groups’.*  Examples of *Equality Data* include: (this list is not definitive)  1: Recruitment data, e.g. applications compared to the population profile, application success rates  2: Complaints by groups who share / represent protected characteristics  4: Grievances or decisions upheld and dismissed by protected characteristic group  5: Insight gained through engagement | Yes    No  Where you have answered yes, please incorporate this data when performing the *Equality Impact Assessment Test* (the next section of this document). If you answered No, what information will you use to assess impact?  **Please note that due to the small number of staff employed by the CCG, data with returns small enough to identity individuals cannot be published. However, the data should still be analysed as part of the EIA process, and where it is possible to identify trends or issues, these should be recorded in the EIA.** |

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| **Assessing Impact** | | | | |
| **Is this policy (or the implementation of this policy) likely to have a particular impact on any of the protected characteristic groups?**  **(Based on analysis of the data / insights gathered through engagement, or your knowledge of the substance of this policy)** | | | | |
| **Protected**  **Characteristic:** | **No**  **Impact:** | **Positive**  **Impact:** | **Negative**  **Impact:** | **Evidence of impact and, if applicable, justification where a *Genuine Determining Reason[[1]](#footnote-1)* exists (see footnote below – seek further advice in this case)** |
| **It is anticipated that these guidelines will have a positive impact as they support policy writers to complete meaningful EIAs, by providing this template and a range of potential issues to consider across the protected characteristics below. There may of course be other issues relevant to your policy, not listed below, and some of the issues listed below may not be relevant to your policy.** | | | | |
| **Gender** |  |  |  |  |
| **Age** |  |  |  |  |
| **Race / ethnicity / nationality** |  |  |  |  |
| **Disability** |  |  |  |  |
| **Religion or Belief** |  |  |  |  |
| **Sexual Orientation** |  |  |  |  |
| **Pregnancy and Maternity** |  |  |  |  |
| **Transgender / Gender reassignment** |  |  |  |  |
| **Marriage or civil partnership** |  |  |  |  |

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| **Action Planning:** | | | | |
| **As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse impact or strengthen the promotion of equality?** | | | | |
| **Identified Risk:** | **Recommended Actions:** | **Responsible Lead:** | **Completion Date:** | **Review Date:** |
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| **Sign-off** |
| **All policy EIAs must be signed off by Mike Napier, Associate Director of Corporate Affairs** |
| **I agree / disagree with this assessment / action plan** |
| **If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales:** |
| **Signed:** |
| **Date:** |

1. 1. *The action is proportionate to the legitimate aims of the organisation (please seek further advice)*

   [↑](#footnote-ref-1)