

# BULLYING AND HARASSMENT POLICY

## March 2018

Authorship:	HR, eMBED			
Committee Approved:	SMT			
Approved date:	March 2018			
Review Date:	May 2018			
	Relevant	Screening	Full / Completed	Outcome
Equality Impact Assessment	Yes	Yes	No	No issues identified
Sustainability Impact Assessment	Yes		Yes	No issues identified
Privacy Impact Assessment	No	No	No	Not Relevant
Bribery Checklist	No		No	Not Relevant
Target Audience:	All CCG Staff			
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Publication/Distribution	Website	Email Staff		Others (i.e. SBC)
	Yes	Yes		No

The on-line version is the only version that is maintained. Any printed copies should, therefore, be viewed as 'uncontrolled' and as such may not necessarily contain the latest updates and amendments.

# POLICY AMENDMENTS

Amendments to the Policy will be issued from time to time. A new amendment history will be issued with each change.

New Version Number	Issued by	Nature of Amendment	Approved By	Date approved	Date on Intranet
DRAFT	SRCCG	Draft policy for CCG	Senior Management Team		
1.0	SRCCG	Policy for CCG	JTUPF	28/05/2014	
1.1	SRCCG	Minor Update GDPR Update	SPF SMT	10/1/2018 12/03/18	19/03/18

# Approval Record

Applicable Y/N	Committee / Group	Consultation / Ratification	Date taken to group	Date last Approved
	Governing Body	Ratification		
	Council of Clinical Representatives	Ratification		
Y	SMT	Ratification	12/03/18	
	Remuneration Committee	Ratification		
	Audit and Governance Committee	Ratification		
	Finance and Contracting Committee	Ratification		
	Business Committee	Ratification		
	Communications and Engagement Committee	Ratification		
	Quality and Performance Committee	Ratification		
	Primary Care Co-Commissioning Committee	Ratification		
	Other	Ratification		
Y	All Employees	Consultation	2014	2014
	Public	Consultation		
Y	Yorkshire and Humber Social Partnership Forum	Consultation	10/01/18	10/01/18

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## **1 INTRODUCTION**

NHS Scarborough and Ryedale CCG (the CCG) recognises that all employees have the right to be treated with consideration, dignity and respect. The CCG seeks to support all staff in their professional development and aims to provide a happy and fulfilling environment in which to work. This policy promotes the respectful treatment of staff within the CCG and the protection of employees from bullying and harassment at work. Bullying and harassment will not be tolerated by the CCG in any form. The relevant employment legislation governing this is as follows:-

- Equality Act 2010
- Health and Safety at Work Act 1974
- Employment Rights Act 1996
- Protection from Harassment Act 1997
- Crime and Disorder Act 1998
- Employment Act 2002

## **2 ENGAGEMENT**

- Joint Trade Union Partnership Forum/Policy Development Group
- SRCCG staff via team meetings/team brief/internet

## **3 IMPACT ANALYSES**

### **3.1 Equality**

In applying this policy, the CCG will have due regard to the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the following characteristics protected by the Equality Act (2010); age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation, in addition to offending background, trade union membership, or any other personal characteristic.

An Equality Impact Assessment is attached at Appendix 4. This policy should be carefully monitored following implementation through the local annual staff survey and the annual monitoring data and to assess whether any particular protected groups are positively or negatively affected in terms of outcomes and accessibility. The policy meets all requirements to encourage staff to report and resolve problems.

### **3.2 Sustainability**

A Sustainability Impact Assessment has been completed for this policy and is attached at Appendix 5.

### **3.3 Bribery Act 2010**

The Bribery Act is particularly relevant to this policy. Under the Bribery Act it is a criminal offence to:

- Bribe another person by offering, promising or giving a financial or other advantage to induce them to perform improperly a relevant function or activity, or as a reward for already having done so; and
- Be bribed by another person by requesting, agreeing to receive or accepting a financial or other advantage with the intention that a relevant function or activity would then be performed improperly, or as a reward for having already done so.
- These offences can be committed directly or by and through a third person and other related policies and documentation (as detailed on the CCG intranet) when considering whether to offer or accept gifts and hospitality and/or other incentives.

Anyone with concerns or reasonably held suspicions about potentially fraudulent activity or practice should refer to the Local Anti-Fraud and Corruption Policy and contact the Local Counter Fraud Specialist

## **4 SCOPE**

The policy applies to all employees of the CCG.

## **5 POLICY PURPOSE & AIMS**

The CCG recognises that all employees have the right to be treated with consideration, dignity and respect. The CCG seeks to support all staff in their professional development and aims to provide a happy and fulfilling environment in which to work.

This policy promotes the respectful treatment of staff within the CCG and the protection of employees from bullying and harassment at work. Bullying and harassment will not be tolerated by the CCG in any form.

Each member of staff carries personal responsibility for their own behaviour in relation to this policy and is responsible for ensuring that their conduct is in line with the standards set out in this policy.

Any employee who wishes to make a complaint of bullying or harassment should firstly discuss this with their line manager providing they feel able to do so. If not then they should discuss their complaint with a more senior manager who may be from a different function.

Allegations raised regarding bullying and harassment will be taken seriously and treated confidentially.

The CCG gives an assurance that there will be no victimisation against an employee making a complaint under this policy or against employees who assist or support a colleague in making a complaint.

Anyone who is found to have victimised a member of staff for making such a complaint, may be subject to disciplinary action.

Bullying and harassment may be treated as a disciplinary offence and, where allegations are founded, may lead to summary dismissal. Disciplinary action may also be taken if a complaint is found to have been submitted maliciously or in bad faith.

If it is considered one of the parties concerned in a bullying or harassment case should be removed from the workplace, as a matter of principle the CCG will remove the alleged harasser on full pay. In no way does this imply any guilt nor does it have any detriment on the investigation.

## 6 DEFINITIONS

### 6.1 What is bullying and harassment?

Harassment, in general terms is unwanted conduct affecting the dignity of employees in the workplace. It may be related to age, sex, race, disability, religion, sexual orientation, nationality or any personal characteristic of the individual, and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.

All employees are responsible for their own behaviour and should act at all times in a professional manner. Please note that people's behaviour in the workplace can vary on a daily basis. This policy is not intended to deal with occasional lapses of good manners unless a pattern of behaviour emerges which is perceived to be offensive or intimidatory.

Bullying may be characterised as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

Harassment may be an isolated occurrence or repetitive, it may occur against one or more individuals. It may be but is not limited to:-

**Physical contact** – ranging from touching to serious assault, gestures, intimidation and aggressive behaviour

**Verbal** – unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter, offensive language

**Non-verbal** – offensive literature or pictures, graffiti and computer imagery, isolation or non-cooperation and exclusions or isolation from workplace social activities

**Bullying** – persistent, offensive, abusive, intimidating or insulating behaviour, abuse of power or unfair sanctions which makes the recipient feel upset, threatened, humiliated or vulnerable. Deliberately undermining a competent employee by imposing unreasonable workloads or frequent unjustified criticism.

Further examples of unacceptable behaviours that can be considered to constitute bullying and harassment are found in Appendix 1.

## **7 SUPPORT AND ADVICE**

The CCG is committed to achieving informal resolution of complaints relating to bullying and harassment wherever possible.

In line with this approach, a series of options have been put into place to enable staff to be supported. This support will be provided to complainants, alleged perpetrators and any witnesses.

### **7.1 Occupational health service**

Any member of staff who is involved in an allegation of bullying and harassment may find it helpful to talk to the occupational health service. All employees have a right to self-refer to occupational health.

### **7.2 Counselling**

Counselling services are confidential and can be accessed through the Occupational Health Service.

### **7.3 Trade unions**

The CCG recognises the important role trade unions and staff organisations play in addressing bullying and harassment and members are encouraged to seek advice from these representatives regarding their concerns. The CCG will work in conjunction with the trade unions and staff organisations in addressing unacceptable and inappropriate behaviours.

Employees may be accompanied by a work colleague not otherwise involved in the case, or a trade union or staff organisation representative at all formal stages of the procedure.

## **8 INFORMAL RESOLUTION**

Every consideration should be given to achieving an informal resolution. Very often people are not aware that their behaviour is unwelcome or misunderstood and an informal discussion can lead to a greater understanding that the behaviour will cease.

If you feel able you should try to resolve the problem informally by making it clear to the alleged harasser that his/her actions are unwanted and should not be repeated.

If you do not feel able to raise your concerns with the person directly, you could write to them stating how you feel, state where and when the incident(s) occurred and how you wish to be treated. You are encouraged to seek advice from your trade union or staff organisation representative, or from a workforce representative when raising your concerns in writing. A note of the action taken should be kept.

If you feel unable to approach the alleged harasser, you could speak to your line manager (if appropriate), a workforce representative, a trade union or staff organisation representative or occupational health. A note should be made of the action taken.

An individual who is made aware that their behaviour is unacceptable should:

- Listen carefully to the complaints and the particular concerns raised
- Respect the other person's point of view
- Agree the aspects of their behaviour that they will change
- Review their general conduct/behaviour at work and with colleagues

## 9 FORMAL RESOLUTION

If the alleged bullying or harassment continues and the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally.

This should initially be raised with your line manager, or if you feel unable to do so then you should discuss the complaint with a more senior manager or a workforce representative.

If possible, employees should keep notes of the incident(s)/harassment so that the written complaint can include:

- The date and times of the incident(s)
- The nature of the alleged harassment or bullying
- The names of any witnesses
- Any action already taken to stop the alleged harassment or bullying
- And any other relevant information

A decision to conduct a formal investigation should be made by the line manager/senior manager after consultation with the workforce representative.

Where an investigation is deemed appropriate, a suitable investigating officer and a workforce representative will be appointed. They will be expected to:

- Take full details of the incidents in writing from the complainant and their representative (if appropriate)
- Take full details from any witnesses/other complainants who come forward and may have witnessed the alleged behaviour
- Make the alleged harasser aware of the formal complaint, he/she should be notified by his/her own Line Manager
- Advise the alleged harasser to seek representation and invite him/her to a meeting in order that they can comment on the allegations against them
- Keep all parties informed of expected timescales
- Inform all parties in writing of the outcome and any action that may be required
- Allow the appropriate involvement of representation for the individuals involved.

Please refer to the Code of Good Practice for Investigations (Appendix 2 of the Disciplinary Policy and Procedure) for further information. This investigation and any action arising from it will be carried out in line with the CCG disciplinary procedure.

If, following investigation, it appears that bullying/harassment/misconduct has occurred; the investigating workforce representative and investigating officer will recommend the appropriate course of action in line with the CCG's disciplinary procedure. A detailed response will be given to both parties outlining the details of the investigation and what action, if any, is being taken in respect of the complaint. This may result in a meeting being convened under the CCG disciplinary policy and the behaviour being viewed as serious misconduct.

If the allegations and the working situation warrant it, the alleged harasser may be suspended during the investigation or transferred temporarily pending the outcome of the inquiry to another business area.

The investigating officer and workforce representative will propose a time frame within which the investigation could reasonably be expected to be completed. However, given the complexities of some issues, this may not always be achievable. Timescales will be discussed in more detail with the individual concerned.

If the complaint is upheld at the disciplinary stage, there are a number of possible outcomes for the harasser, depending on the evidence presented and the circumstances. These could include, but are not limited to:-

- Dismissal
- A formal warning
- A recommendation of redeployment of the harasser either on a temporary or permanent basis. This will not be on any less favourable terms and conditions of employment
- Making arrangements for both parties to work as separately as possible
- Training for the harasser as deemed necessary

The claimant may wish to move departments/sections depending upon the nature of the complaint and the people involved. Appropriate consideration should be given to this request and the outcome with reasons provided to the complainant.

With any allegation, the need for a thorough and objective investigation is paramount. Consequently, if through the course of the investigation evidence supports that the allegation has been made maliciously then the individual making the complaint may be subject to disciplinary proceedings.

## **10 RECORD KEEPING**

Following resolution of both formal and informal bullying and harassment complaints, a record should be kept of the incident. Where bullying or harassment did occur, it is important to check that this has stopped and that there has been no subsequent victimisation. Monitoring will be carried out on a regular basis with both parties.

## **11 CONFIDENTIALITY**

All employees involved with the investigation and any subsequent process are required to respect the need for confidentiality.

All complaints, associated correspondence and interviews will be treated in strict confidence. Breaches in confidentiality will be subject to disciplinary action.

However it must be remembered that legislation requires the accused to be made aware of the allegations against them and the names of those making the allegations and the name of any witnesses.

The CCG is committed to ensuring that all personal information is managed in accordance with current data protection legislation, professional codes of practice and records management and confidentiality guidance. More detailed information can be found in the CCGs Data Protection and Confidentiality and related policies and procedures.

## **12 APPEAL**

Appeals against decisions taken under Bullying and Harassment Policy shall be dealt with as follows:-

- Appeals against a disciplinary sanction will be dealt with in accordance with the appeals process in the disciplinary procedure
- Appeals by a complainant about the outcome of any inquiry should be notified to the workforce department with 28 days, giving their reasons for appeal

## **13 ROLES / RESPONSIBILITIES / DUTIES**

### **13.1 Responsibility of staff**

All staff have personal responsibility for their own behaviour and for ensuring that they comply with the policy. There are a number of things that staff can do to help prevent harassment, such as:

- Set a positive example by treating others with respect
- Be aware of the CCG's policy and comply with it
- Do not accept behaviour that is offensive or unwanted when directed against you or others, and take positive action to ensure that it is challenged and/or reported
- Be supportive of colleagues who may be subject to bullying and/or harassment

If you are subject to bullying and/or harassment but do not feel able to talk about it yet, you should keep a record of the incidents including dates and times. You can also contact a workforce representative or Trade Union representative for advice and support.

### **13.2 Responsibility of managers**

All managers have a responsibility to implement this policy and to bring it to the attention of staff in their work area, in order to establish and maintain a work environment free of bullying or harassment. They must:

1. treat a complaint seriously and deal with it promptly and confidentially, giving the employee and the alleged perpetrator support during the process
2. set a positive example by treating others with respect and setting standards of acceptable behaviour; also, promote a working environment where bullying and harassment is unacceptable and not tolerated
3. tackle, and where possible, resolve incidents of bullying and harassment
4. consult with a workforce representative at any time for advice and support.

### **13.3 Role of the eMBED Workforce Team**

The eMBED Workforce Team is responsible for advising on the application and interpretation of the policy to ensure that it is followed, fairly and consistently.

They will:

1. advise managers on the application of the policy
2. advise managers and staff where individuals feel that they are being harassed or bullied in the course of their employment
3. advise on the effective implementation of the policy
4. monitor incidence of bullying and harassment and initiating appropriate action
5. review and amend the policy as necessary

## **14 IMPLEMENTATION**

This policy will be communicated to staff via team meetings/team brief and will be available for staff on the intranet.

Breaches of this policy may be investigated and may result in the matter being treated as a disciplinary offence under the CCGs disciplinary procedure.

## **15 TRAINING & AWARENESS**

A copy of the policy will be available on the CCG intranet. Training needs will be identified via the appraisal process and training needs analysis.

## **16 MONITORING & AUDIT**

The implementation of this policy will be audited on an annual basis by the CCG and reported to CCG Governing Body.

## **17 POLICY REVIEW**

The policy and procedure will be reviewed after 3 years for the CCG Governing Body in conjunction with Trade Union representatives. Where review is necessary due to legislative change, this will happen immediately.

## **18 APPENDICES**

Appendix 1 Examples of Unacceptable Behaviours which may constitute bullying and harassment

Appendix 2 Informal Resolution

Appendix 3 Formal Resolution

Appendix 4 Equality Impact Assessment

Appendix 5 Sustainability Impact Assessment

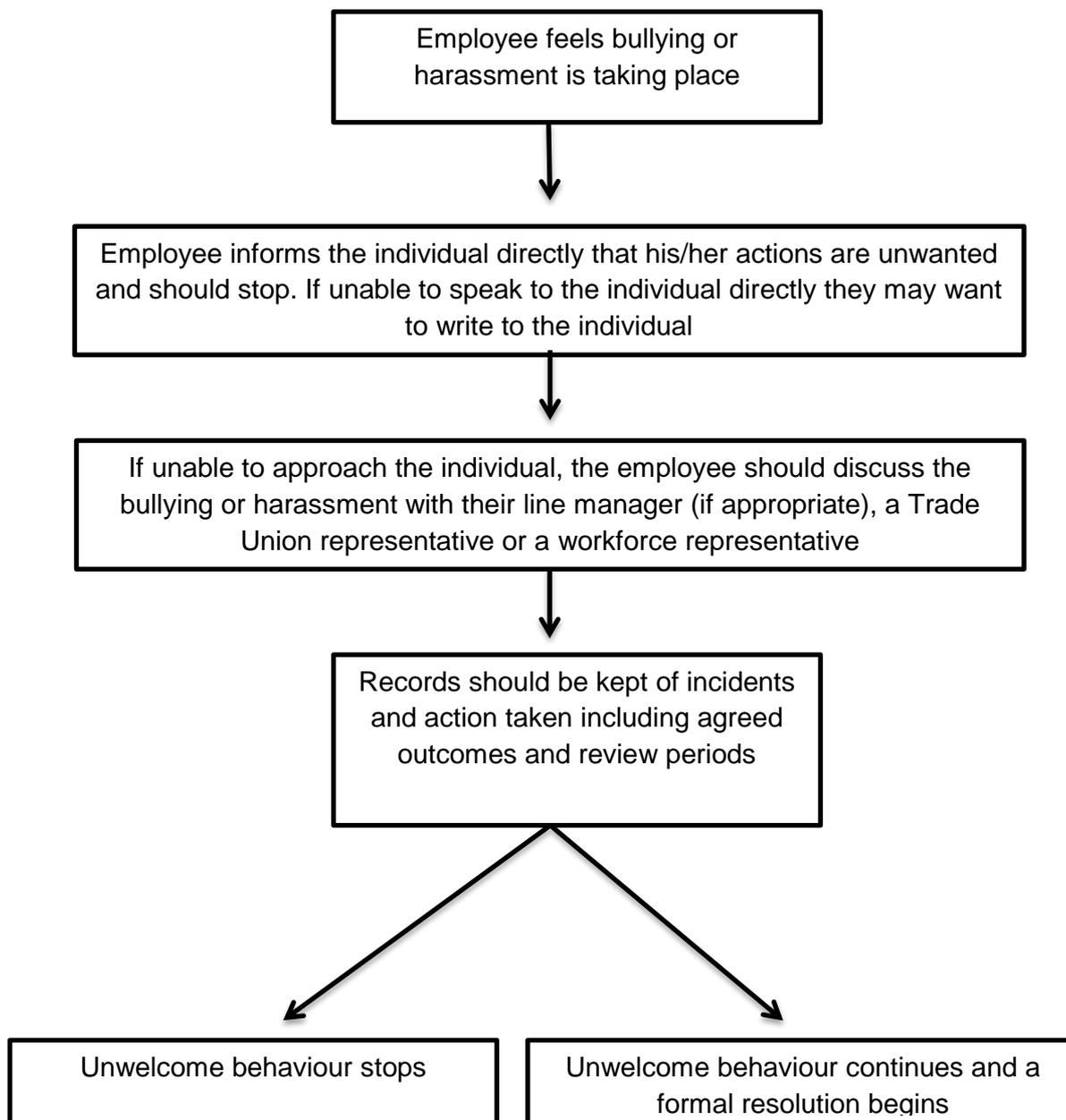
## **APPENDIX 1 – EXAMPLES OF UNACCEPTABLE BEHAVIOUR THAT CAN BE CONSIDERED TO CONSTITUTE BULLYING AND HARASSMENT:**

Examples of unacceptable behaviour that can be considered to constitute bullying and harassment:

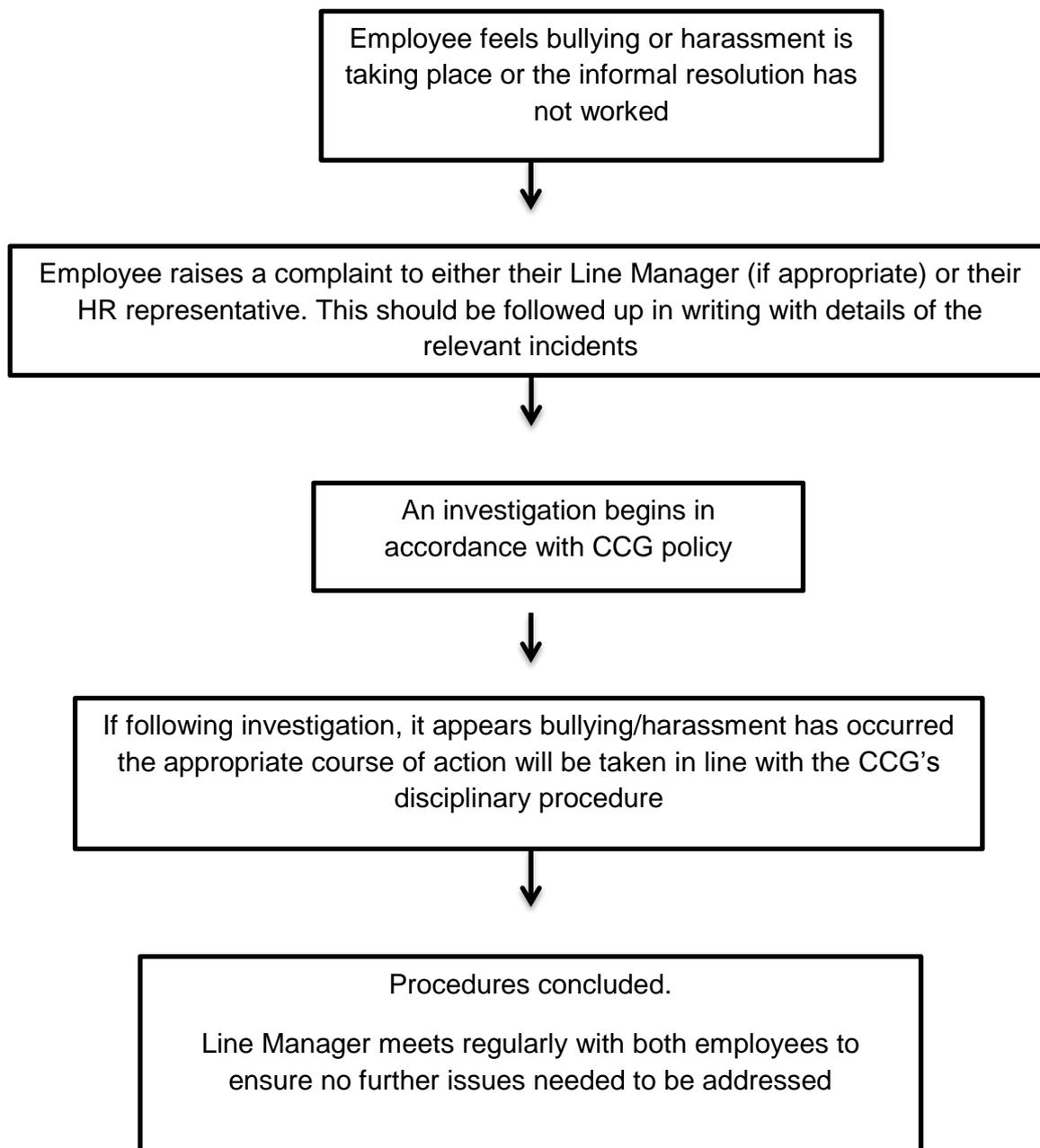
- Bullying by exclusion - this may take the form of social isolation and/or exclusion from meetings
- The deliberate withholding of information with the intention of affecting a colleague's performance
- Unfair and destructive criticism
- Intimidating behaviour
- Verbal abuse and spreading of unfounded rumours
- Humiliation or ridicule
- Setting of unrealistic targets which are unreasonable and/or changed with limited notice or consultation
- Copying information that is critical about someone to others who do not need to know

Please note this list is not exhaustive.

## 19 APPENDIX 2 – INFORMAL RESOLUTION



## APPENDIX 3 – FORMAL RESOLUTION



## APPENDIX 4 – EQUALITY IMPACT ASSESSMENT

General Information							
<b>Policy:</b>	Bullying and Harassment Policy						
<b>Date of Analysis:</b>	March 2018						
<b>Policy Lead: (Name, job title and department)</b>	Corporate Services Manager						
<b>What are the aims and intended effects of this policy?</b>	This policy promotes the respectful treatment of staff within the CCG and the protection of employees from bullying and harassment at work. Bullying and harassment will not be tolerated by the CCG in any form.						
<b>Are there any significant changes to previous policy likely to have an impact on staff, patients or other stakeholder groups?</b>	No						
<b>Please list any other policies that are related to or referred to as part of this analysis</b>	<ul style="list-style-type: none"> <li>• Disciplinary Policy</li> </ul>						
<b>Who is likely to be affected by this policy?</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #002060; color: white;">General Public</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="background-color: #002060; color: white;">Service Users</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="background-color: #002060; color: white;">Staff</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </table>	General Public	<input type="checkbox"/>	Service Users	<input type="checkbox"/>	Staff	<input checked="" type="checkbox"/>
General Public	<input type="checkbox"/>						
Service Users	<input type="checkbox"/>						
Staff	<input checked="" type="checkbox"/>						
<b>What engagement / consultation has been done, or is planned for this policy and the equality impact assessment?</b>	Consutation has taken place locally and nationally with Trade Union Representatives						
<b>Promoting Inclusivity and NHS Scarborough and Ryedale CCG's Equality Objectives.</b>  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	This Policy does not directly promote inclusivity, but can contribute to the aims of eliminating discrimination and promoting equality and diversity in the CCG						

# Employee Equality Data

<b>General</b>	Total number of employees in the CCG is 87
<b>Age</b>	11.5% of staff are under 30 54.02% of staff aged 30 - 55 34.48 of staff are over 55
<b>Gender</b>	81.61% of staff employed are female 18.39% of staff employed are male
<b>Race / Nationality</b>	87.36% of staff employed in the CCG declared themselves White 10.34% of staff are not stated/undefined 2.30% of staff declared themselves Mixed
<b>Disability</b>	75.86% of staff employed declared themselves as having no disability 22.99% of staff did not declare /undefined 1.15% of staff declared a disability
<b>Sexual Orientation</b>	63.22% of staff described themselves as heterosexual 1.15% of staff described themselves as gay 35.63% did not wish to respond /undefined
<b>Gender Reassignment</b>	No information available
<b>Religion / Belief</b>	Christianity is the largest religious group declared by staff in the CCG 42.53% 35.63% were undefined or did not wish to declare 21.84% of staff declared other faith or religious beliefs
<b>Pregnancy and Maternity</b>	No information yet as the CCG has not been established long enough to build meaningful data
<b>Marriage and civil partnership</b>	58.61% of employees are married. 24.14% of employees are single 6.90% of employees are divorced 9.20% of employees were undefined or did not wish to declare 1.15% of employees are in a civil partnership

# 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 <i>Genuine Determining Reason</i> <sup>1</sup> exists (see footnote below – seek further advice in this case)
Gender		X		In the national NHS staff survey 21% of men and 22% of women reported having experienced bullying or harassment from other staff. It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment'
Age		X		The policy should have a positive impact on all protected groups It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment'
Race / ethnicity / nationality		X		It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment'
Disability		X		In the national NHS staff survey 32% of disabled staff and 20% of non-disabled staff reported having experienced bullying or harassment from other staff. The policy should support disabled staff.
Religion or Belief		X		The policy should have a positive impact on all protected groups It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment'
Sexual Orientation		X		The policy should have a positive impact on all staff It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment'
Pregnancy and Maternity		X		In all cases where complaints arise, the CCG will investigate in accordance with the policy to ensure that cases are dealt with appropriately. The policy should have a positive impact on all protected groups It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment' In terms of the legal context the Equality Act Code of Practice produced by the CEHR states the following : 'Pregnancy and maternity and marriage and civil partnership are not protected directly under the harassment provisions. Pregnancy and maternity harassment would amount to harassment related to sex' In addition the ACAS advice guide sets out the following: 'Harassment applies to all protected characteristics except for pregnancy and maternity where any unfavourable treatment may be considered discrimination, and marriage and civil partnership where there is no significant evidence that it is needed' (Link - <a href="http://www.acas.org.uk/media/pdf/o/c/Bullying-and-harassment-at-work-a-guide-for-employees.pdf">http://www.acas.org.uk/media/pdf/o/c/Bullying-and-harassment-at-work-a-guide-for-employees.pdf</a> )

1. <sup>1</sup> The action is proportionate to the legitimate aims of the organisation (please seek further advice)

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and, if applicable, justification where a <i>Genuine Determining Reason</i> <sup>2</sup> exists (see footnote below – seek further advice in this case)
Transgender / Gender reassignment		X		The policy should have a positive impact on all protected groups. It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment'
Marriage or civil partnership		X		In all cases where complaints arise, the CCG will investigate in accordance with the policy to ensure that cases are dealt with appropriately. The policy should have a positive impact on all protected groups. It is recognised by the Chartered Institute of Personnel and Development that 'a well-designed policy is essential to tackle harassment' In terms of the legal context the Equality Act Code of Practice produced by the CEHR states the following : 'Pregnancy and maternity and marriage and civil partnership are not protected directly under the harassment provisions... harassment related to civil partnership would amount to harassment related to sexual orientation.'  In addition the ACAS advice guide sets out the following: 'Harassment applies to all protected characteristics except for pregnancy and maternity where any unfavourable treatment may be considered discrimination, and marriage and civil partnership where there is no significant evidence that it is needed' (Link - <a href="http://www.acas.org.uk/media/pdf/o/c/Bullying-and-harassment-at-work-a-guide-for-employees.pdf">http://www.acas.org.uk/media/pdf/o/c/Bullying-and-harassment-at-work-a-guide-for-employees.pdf</a> )
<b>What sources of equality information have you used to inform your piece of work?</b> (Please refer to the JSNAs and Population data, previous engagement findings, research, patient experience reports etc.)				
Not applicable				
<b>What measures have been put in place to mitigate any potential impact?</b>				
Not applicable				

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2. <sup>2</sup> The action is proportionate to the legitimate aims of the organisation (please seek further advice)

# 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:

# Sign-off

All EIAs must be signed off by a member of SMT

I agree with this assessment / action plan

Signed off by (Name/Job Title) Sally Brown, Associate Director of Corporate Affairs

Signed: July 2017

# SUSTAINABILITY IMPACT ASSESSMENT

### Instructions

Sustainability is one of the CCG's key priorities and consequently the CCG has made a corporate commitment to address the environmental effects of its activities across all service areas. The purpose of the Sustainability Impact Assessment is to record any positive or negative impacts that a Policy / Board Report / Committee Report / Service Plan / Project is likely to have on each of the CCG's sustainability themes. The Sustainability Impact Assessment enables any relevant impacts to be identified and potentially managed.

The Sustainability Impact Assessment is based on assessing the impact of the activity against a series of criteria covering environmental sustainability issues. It would be most desirable for activities to score positively in as many areas as possible, although it is likely that some areas will score positively against some themes, and negatively against others.

### Using the Sustainability Impact Assessment template

To complete the Sustainability Impact Assessment template, you should consider whether the Policy / Board Report / Committee Report / Service Plan / Project will have a positive or negative impact on each of the themes by placing a mark in the appropriate column. When you think there is likely to be an impact, please provide some annotations regarding the nature of the impact, and any actions that will be taken to address that impact. Users should note that not every theme will be relevant. Where this is the case the 'No Specific Impact' column should be marked. Users should also consider the following tips:

1. Make relative not absolute judgements (e.g. a new energy efficient service would score positively even if it consumes more energy than if no service were provided).
2. Be aware that small positive changes could be outweighed by negative ones (e.g. new energy efficient lighting in the short term may outweigh the benefits of maintaining current lighting).
3. If there are both positive and negative impacts, these need to be recorded in order to give a balanced view. Be objective and unbiased.
4. Concentrate on the most key significant issues - there is the potential to consider the appraisal in a very detailed way. This should be avoided at this stage.
5. Judge a proposal over its whole lifespan and remember that some impacts may change over different timescales.

If you require assistance in completing the Sustainability Impact Assessment please contact the Corporate Services Team

Domain	Review questions	Assessment of Impact Negative = -1 Neutral = 0 Positive = 1 Unknown = ? Not applicable = n/a	Brief description of impact	If negative, how can it be mitigated? If positive, how can it be enhanced?
<b>Models of Care</b>	<p>Will it minimise 'care miles' making better use of new technologies such as telecare and telehealth, delivering care in settings closer to people's homes?</p> <p>Will it create incentives to promote prevention, healthy behaviours, mental wellbeing, living independently and self-management?</p> <p>Will it provide evidence-based, personalised care that achieves the best possible health and well-being outcomes with the resources available?</p> <p>Will it reduce avoidable hospital admissions or permanent admissions to residential care or nursing homes?</p> <p>Will it pay for services based on health outcomes rather than activity for example through personal budgets?</p> <p>Will it deliver integrated care, that co-ordinate different elements of care more effectively and remove duplication and redundancy from care pathways?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/clinical-and-care-models.aspx">http://www.sduhealth.org.uk/areas-of-focus/clinical-and-care-models.aspx</a></p>	n/a		
<b>Travel</b>	<p>Will it reduce 'care miles' (telecare, care closer) to home?</p> <p>Will it reduce repeat appointments?</p> <p>Will it provide / improve / promote alternatives to car based transport (e.g. public transport, walking and cycling)?</p> <p>Will it support more efficient use of cars (car sharing, low emission vehicles, community transport, environmentally friendly fuels and technologies)?</p> <p>Will it improve access to services and facilities for vulnerable or disadvantaged groups or individuals?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/travel.aspx">http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/travel.aspx</a></p>	n/a		
<b>Facilities Management</b>	<p>Will it reduce the amount of waste produced or increase the amount of waste recycled?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/waste.aspx">http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/waste.aspx</a></p> <p>Will it reduce water consumption?</p> <p>Will it improve the resource efficiency of new or refurbished buildings (water, energy, density, use of existing buildings, designing for a longer lifespan)?</p> <p>Will it improve green space and access to green space?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/energy.aspx">http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/energy.aspx</a></p>	n/a		
<b>Adaptation to Climate Change</b>	<p>Will it support mitigation of the likely effects of climate change (e.g. identifying proactive and community support for vulnerable groups; contingency planning for flood, heatwave and other weather extremes)?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/community-resilience/community-resilience-copy.aspx">http://www.sduhealth.org.uk/areas-of-focus/community-resilience/community-resilience-copy.aspx</a></p>	n/a		

<b>Procurement</b>	<p>Will it specify social, economic and environmental outcomes to be accounted for in procurement and delivery in line with the <a href="#">Public Services (Social Value) Act 2012</a>?</p> <p>Will it stimulate innovation among providers of services related to the delivery of the organisations' social, economic and environmental objectives?</p> <p>Will it reduce waste, environmental hazards and toxic materials for example by reducing PVC, antibiotic use, air pollution, noise, mining and deforestation?</p> <p>Will it reduce use of natural resources such as raw materials, embedded water, and energy to promote a <a href="#">circular economy</a>?</p> <p>Will it support the local economy through local suppliers, SMEs or engage with third sector or community groups?</p> <p>Will it <a href="#">promote ethical purchasing of goods or services</a> e.g. increasing transparency of modern slavery in the supply chain globally?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/commissioning-and-procurement/procurement.aspx">http://www.sduhealth.org.uk/areas-of-focus/commissioning-and-procurement/procurement.aspx</a></p>	<p>n/a</p>		
<b>Workforce</b>	<p>Will it provide employment opportunities for local people?</p> <p>Will it promote or support equal employment opportunities?</p> <p>Will it promote healthy working lives (including health and safety at work, work-life/home-life balance and family friendly policies)?</p> <p>Will it offer employment opportunities to disadvantaged groups and pay above living wage?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/social-value.aspx">http://www.sduhealth.org.uk/areas-of-focus/social-value.aspx</a></p>	<p>n/a</p>		
<b>Community Engagement</b>	<p>Will it promote health, increase community resilience, social cohesion, reduce social isolation and support sustainable development?</p> <p>Will it <a href="#">reduce inequalities in health</a> and access to services?</p> <p>Will it increase participation including patients, the public, health professionals and elected officials to contribute to decision making?</p> <p>Have you sought the views of our communities in relation to the impact on sustainable development for this activity?</p> <p>Will it increase peer-support mechanisms?</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/community-resilience.aspx">http://www.sduhealth.org.uk/areas-of-focus/community-resilience.aspx</a></p>	<p>n/a</p>		
<b>Estimated carbon benefit</b>	<p>What is the estimated carbon benefit (in terms of tCO<sub>2</sub>e) from the implementation of this project? As opposed to the current business as usual position. Speak with your sustainability manager and see the following guidance:</p> <p>More info: <a href="http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/pharmaceuticals/cspm/sustainable-care-pathways-guidance.aspx">http://www.sduhealth.org.uk/areas-of-focus/carbon-hotspots/pharmaceuticals/cspm/sustainable-care-pathways-guidance.aspx</a></p>	<p>n/a</p>		