



**Equality Impact Analysis:**

<b>Policy / Project / Function:</b>	Freedom Of Information Act and Environmental Information Regulations Policy										
<b>Date of Analysis:</b>	October 2016										
<b>This Equality Impact Analysis was completed by: (Name and Department)</b>	Olga Gourtchenkova Freedom of Information (FOI) Manager NHS East Riding of Yorkshire Clinical Commissioning Group (CCG)										
<b>What are the aims and intended effects of this policy, project or function?</b>	<ul style="list-style-type: none"> <li>• To provide advice and guidance on the FOI Act and EIRs for CCG staff and potential applicants under the Act and Regulations.</li> <li>• To advise on the procedures followed for processing FOIs</li> </ul>										
<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>• Hull CCG Complaints Policy</li> <li>• Hull CCG Records Management</li> <li>• Caldicott and Data Protection Policy</li> <li>• Disciplinary Procedure</li> </ul>										
<b>Who does the policy, project or function affect ?</b>  Please Tick ✓	<table border="0"> <tr> <td data-bbox="400 1509 874 1547">Employees</td> <td data-bbox="884 1503 986 1576"><input checked="" type="checkbox"/></td> </tr> <tr> <td data-bbox="400 1615 874 1653">Service Users</td> <td data-bbox="884 1608 986 1682"><input checked="" type="checkbox"/></td> </tr> <tr> <td data-bbox="400 1715 874 1753">Members of the Public</td> <td data-bbox="884 1709 986 1783"><input checked="" type="checkbox"/></td> </tr> <tr> <td data-bbox="400 1821 874 1859">Other (List Below)</td> <td data-bbox="884 1812 986 1886"><input checked="" type="checkbox"/></td> </tr> <tr> <td data-bbox="400 1888 874 1926"> <ul style="list-style-type: none"> <li>• Agency and Contract Staff</li> </ul> </td> <td></td> </tr> </table>	Employees	<input checked="" type="checkbox"/>	Service Users	<input checked="" type="checkbox"/>	Members of the Public	<input checked="" type="checkbox"/>	Other (List Below)	<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>• Agency and Contract Staff</li> </ul>	
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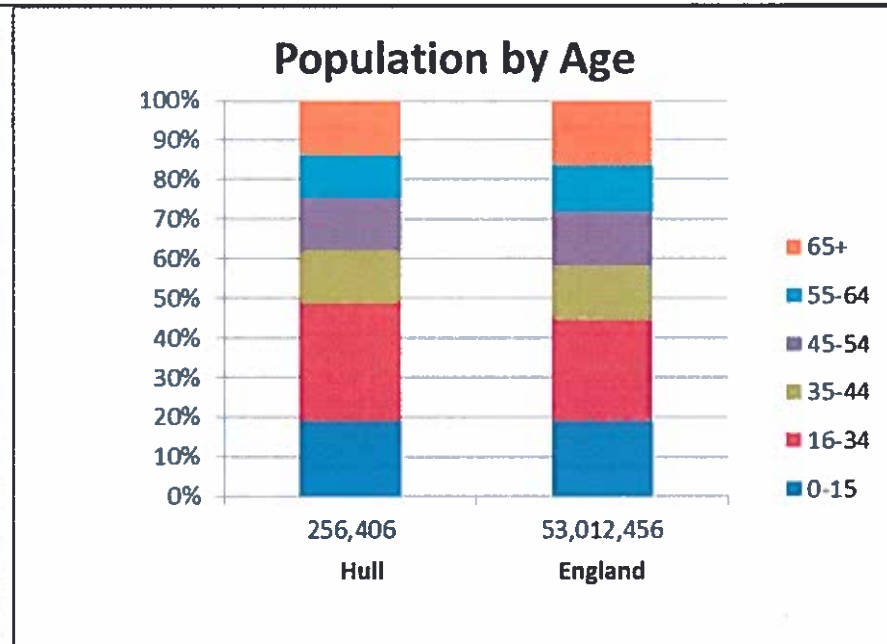
**Local Profile/Demography of the Groups affected** (population figures) Relevant data can be found in the attached Knowledge Management Toolkit

### General

There are 50 GP practices in the Hull area which spans 7,154 hectares and, as a city, has relatively tight geographical boundaries with most of the 'leafy suburb' areas outside Hull's boundaries in East Riding of Yorkshire. As a result, Hull has a relatively high deprivation score, as measured by the Index of Multiple Deprivation 2010, with Hull ranked as the 10th most deprived local authority out of 326 (bottom 4%).

The resident population of Hull is 256,406 based on the 2011 Census data and 265,369 residents based on estimates from the local GP registration file as at October 2011. This equates to approximately 37 residents per hectare. The Joint Strategic Needs Assessment (JSNA) identifies considerable inequalities in health between Hull and England, and between populations within Hull.

### Age



Compared to England, Hull has lower percentages of residents aged 10-19 years and 55+ years, but slightly higher percentages aged under 5, 20-34 years and 45-54 years. There is a relatively large difference between Hull and England for the age group 20-34 years, due to Hull's colleges and Universities.

There were 2,869 live births occurring to Hull residents in 2001, but this has increased steadily to 3,771 for 2010. The number of deaths occurring to Hull residents has decreased from 2,571 to 2,310 between 2001 and 2010. ONS estimated the resident population to be 243,596 in 2001 compared to 260,424 residents based on the GP registration file,

	<p>with the difference between these estimates narrowing over time. So, whilst it is difficult to quantify the exact increase in Hull's population, it has increased over recent years. Between 2010 and 2030, ONS estimate that Hull's population will increase from 266,100 to 311,900 residents, an increase of 17%.</p> <p>The figure above shows the population of Hull (2011 Census Data).</p>																
<b>Race</b>	<p>The percentage of the population from Black and Minority Ethnic (BME) groups has increased substantially since 2001. For the 2001 Census, it was estimated that 3.3% of Hull's population was not White British or White Irish, whereas Census data shows that this figure increased to 10.2% for 2011. There is no single BME group in Hull with much higher percentages compared to other groups. The 2011 census data shows:</p> <p>White British - 89.7%  White Other - 4.4%  Mixed - 1.3%  Asian - 2.5%  Black - 1.2%  Other - 0.8%</p>																
<b>Sex</b>	<p>The gender split in Hull is approximately 50.1% men and 49.9% women. For 2008-2010, life expectancy in Hull was 75.7 years for men and 80.2 years for women compared to 78.6 years and 82.6 years for men and women respectively in England.</p>																
<b>Gender reassignment</b>	<p>No local information provided.</p>																
<b>Disability</b>	<p>According to the 2011 Census, it is estimated that approximately 19.7% of the Hull population lives with a long term health problem or disability compared with 17.6% for England. This information can be broken down further (Source: Projecting Older People Population Information System and Projecting Adult Needs and Service Information) to include learning disabilities, physical disabilities, hearing impairments and visual impairments, as follows:</p> <table border="1"> <thead> <tr> <th>2012 Estimates</th> <th>Hull</th> </tr> </thead> <tbody> <tr> <td>Learning Disability (Age 18 – 64)</td> <td>4,078</td> </tr> <tr> <td>Learning Disability (Age 65 and over)</td> <td>762</td> </tr> <tr> <td>Physical Disability – Moderate (Age 18 – 64)</td> <td>12,222</td> </tr> <tr> <td>Physical Disability – Serious (Age 18 – 64)</td> <td>3,491</td> </tr> <tr> <td>Visual Impairment (Age 18 – 64)</td> <td>108</td> </tr> <tr> <td>Visual Impairment (Age 65 and over)</td> <td>3,263</td> </tr> <tr> <td>Hearing Impairment – Moderate or Severe (Age 18 –</td> <td>5,765</td> </tr> </tbody> </table>	2012 Estimates	Hull	Learning Disability (Age 18 – 64)	4,078	Learning Disability (Age 65 and over)	762	Physical Disability – Moderate (Age 18 – 64)	12,222	Physical Disability – Serious (Age 18 – 64)	3,491	Visual Impairment (Age 18 – 64)	108	Visual Impairment (Age 65 and over)	3,263	Hearing Impairment – Moderate or Severe (Age 18 –	5,765
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	Hearing Impairment – Profound (Age 18 – 64)	49																					
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<b>Sexual Orientation</b>	There are no local statistics for how many Lesbian, Gay or Bisexual (LGB) people live within Hull however, nationally, the Government estimates that 5% of the population are lesbian, gay, bi and transgender communities.																						
<b>Religion, faith and belief</b>	According to the 2011 Census, 54.9% of the population have identified themselves as Christian and 3.1% of the population is made up of other religions. The remainder of the population did not state anything (7.2%) or stated 'no religion' (34.8%).																						
	<table border="1"> <thead> <tr> <th>Religion</th> <th>2011</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>54.9%</td> </tr> <tr> <td>Buddhist</td> <td>0.3%</td> </tr> <tr> <td>Hindu</td> <td>0.2%</td> </tr> <tr> <td>Jewish</td> <td>0.1%</td> </tr> <tr> <td>Muslim</td> <td>2.1%</td> </tr> <tr> <td>Sikh</td> <td>0.1%</td> </tr> <tr> <td>Other Religion</td> <td>0.3%</td> </tr> <tr> <td>No Religion</td> <td>34.8%</td> </tr> <tr> <td>Religion Not Stated</td> <td>7.2%</td> </tr> </tbody> </table>			Religion	2011	Christian	54.9%	Buddhist	0.3%	Hindu	0.2%	Jewish	0.1%	Muslim	2.1%	Sikh	0.1%	Other Religion	0.3%	No Religion	34.8%	Religion Not Stated	7.2%
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<b>Marriage and civil partnership</b>	This protected characteristic generally only applies in the workplace. Data from the Office of National Statistics covering the period 2008-2010 indicates that there were 18,049 Civil Partnerships in England and Wales during this three-year period – 52% men and 48% women.																						
<b>Pregnancy and maternity</b>	There were 2,869 live births occurring to Hull residents in 2001, but this has increased steadily to 3,771 for 2010.																						

## Equality Impact Analysis:

<p><b>Is any Equality Data available relating to the use or implementation of this policy, project or function ?</b></p> <p>Equality data is internal or external information that may indicate how the activity being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as ‘<i>Equality Groups</i>’.</p> <p>Examples of <i>Equality Data</i> include: (this list is not definitive)</p> <p>1: Application success rates <i>Equality Groups</i>                  2: Complaints by <i>Equality Groups</i>                  3: Service usage and withdrawal of services by <i>Equality Groups</i>                  4: Grievances or decisions upheld and dismissed by <i>Equality Groups</i></p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>Where you have answered yes, please incorporate this data when performing the <i>Equality Impact Assessment Test</i> (the next section of this document).</p>
<p><b>List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function</b></p>	<p>In the initial development of this policy discussion took place between Hull CCG and the FOI Team. Previous versions of the policy have been reviewed and approved by Hull CCG Governing Board.</p> <p>Further internal engagement within the CCG has taken place with respect to the revised policy.</p>
<p><b>Promoting Inclusivity</b></p> <p>How does the project, service or function contribute towards our aims of eliminating discrimination and promoting equality and diversity within our organisation</p>	<p>Hull CCG will respond to all enquiries under the FOI Act and EIR regardless of the needs of the requestor. Information can be requested and provided in various formats including alternative languages, Braille, large print and audio.</p>

## Equality Impact Assessment Test:

**What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?**

Protected Characteristic:	No Impact:	Positive Impact:	Negative Impact:	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
<b>Gender</b> (Men and Women)	✓			This has been considered and has neutral impact. The policy applies to all, regardless of gender.
<b>Race</b> (All Racial Groups)	✓			As the policy is written in English there is a potential impact on employees whose first language is not English and therefore may struggle reading the policy. However this potential impact is minimised due to the FOI Team being contactable to help discuss any queries in dealing with FOI requests. There is an FOI section on the CCG website – which also has translation functionality and other accessibility options.
<b>Disability</b> (Mental and Physical)	✓			<p>There is a requirement under the FOI Act that all applicants make requests for information in writing. Potential applicants with a disability making them unable to put a request in writing may be disadvantaged.</p> <p>However, there is a further requirement under the FOI Act for the organisation to provide advice and assistance to the applicant which would include alternative ways to make requests.</p> <p>The CCG policy has been developed to include a telephone request application form which can be used to record a verbal request made by an applicant.</p> <p>All communications are available in accessible formats on request.</p>

					e.g. in Braille and larger print.
<b>Religion or Belief</b>	✓				This has been considered and has neutral impact. The policy applies to all, regardless of their individual religion or belief.
<b>Sexual Orientation</b> (Heterosexual, Homosexual and Bisexual)	✓				This has been considered and has neutral impact. The policy applies to all, regardless of their sexual orientation.
<b>Pregnancy and Maternity</b>	✓				This has been considered and has neutral impact. The policy applies to all, regardless of being pregnant or on maternity leave.
<b>Transgender</b>	✓				This has been considered and has neutral impact. The policy applies to all, regardless of gender reassignment.
<b>Marital Status</b>	✓				This has been considered and has neutral impact. The policy applies to all, regardless of their marital status.
<b>Age</b>	✓				This has been considered and has neutral impact. Age-related impairers such as degeneration in sight and hearing will affect older employees and/or applicants. However, the accessible formats available to all employees will mediate any potential impact this may have on older individuals.

## Action Planning:

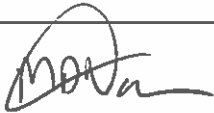
As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by *The Equality Act 2010* ?

Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:



## Equality Impact Findings:

<b>Analysis Rating:</b>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> Red      Red      Amber      Green Amber
<b>Red – Stop and remove the policy</b>	<b>Red:</b> As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.
<b>Red Amber – Continue the policy</b>	<b>Red Amber:</b> As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken.
<b>Amber – Adjust the Policy</b>	<b>Amber:</b> As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.
<b>Green – No major change</b>	<b>Green:</b> As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.

<b>Other Comments:</b>	
<b>Confirmed by (Manager): (Name and Title)</b>	
<b>Date:</b>	01/11/16

