



**North Central London**  
Clinical Commissioning Group

## **Appendix 2**

# **Equality Impact Assessment**

Formal consultation on the transfer of staff of NHS North Central London Clinical Commissioning Group (NHS NCL CCG) to the NHS North Central London Integrated Care Board (NHS NCL ICB) on  
01 July 2022

## **1. INTRODUCTION**

Staff from NHS NCL CCG to NHS NCL ICB will be transferred under the statutory transfer scheme made by NHS England. The statutory transfer scheme sets out that the process by which the transfer of staff will be undertaken will be in accordance with that required by the Cabinet Office Statement of Practice (COSoP) on staff transfers and TUPE (the Transfer of Undertakings (Protection of Employment) Regulations 2006 as amended by the Collective Redundancies & Transfer of Undertaking (Protection of Employment) (Amendment) Regulations 2014. In situations where an employee transfers from one employer to another employer under the COSoP and TUPE, all employment rights including terms and conditions of employment and continuity of services are protected.

An Equality Impact Assessment (EQIA) has been completed to ensure 'due regard' to the public sector equality duty. The CCG is committed to ensuring the EQIA is carried out in a robust and effective way and the outcomes including any recommendations or actions are followed through to ensure compliance.

## **2. EQUALITIES AND HEALTH INEQUALITIES STATEMENT**

Advancing inclusion and ensuring equity for our patients and staff remain at the heart of the CCG's values, and will be reflected in the new ICB structure, governance, policies and programmes. We are committed to ensuring:

- The ICB is used as an opportunity to strengthen the CCG's existing systems and processes for improved inclusion and equity performance and accountability.
- Continuous compliance with the equality and human rights duties and NHS standards, we are dedicated to addressing inequalities collaboratively by designing local solutions that enable the ICS to achieve better equitable outcomes for all groups.
- The experiences and learnings from staff, patients and community engagement shape our Diversity and Inclusion priorities.

## **3. EQUALITY IMPACT ASSESSMENT - PRINCIPLES**

The CCG is committed to managing this change management process in a way that is equitable, fair and transparent. To facilitate this, the CCG will ensure the following equality impact assessment principles are followed:

- The change process has been undertaken in accordance with the CCG's Change Management Policy and NHSE HR Framework.
- No employee will be discriminated against on the grounds of contractual status, caring responsibilities or any protected characteristic as defined by the Equality Act.
- Adherence and compliance with the public sector equality duty and NHS good practice recommendations; that no staff should be unfairly treated or

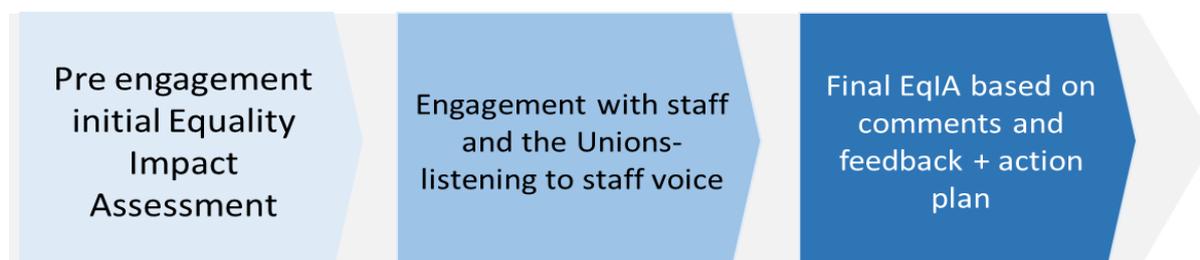
discriminated against on the ground of their protected characteristics or their association with someone with a protected characteristic.

- Any adverse impact identified through this EQIA for any staff within a protected characteristic group will be either eliminated or minimised by the actions identified within this equality impact assessment.
- The engagement process will be undertaken with due regard to the CCG's Diversity and Inclusion Strategy and Objectives (2021-2023), the CCG values and the CCG's commitment to progressing a fair and just culture for all staff.
- We will ensure that, as part of our ongoing commitment to advancing disability equality, due attention is given to disabled staff, those with long-term conditions and carers. Managers will be required to address the need for any reasonable adjustment before the transfer takes place.
- The CCG is committed to undertaking the actions identified in Sections 5 and 6 to reduce/mitigate any adverse impact and increase/safeguard positive impact for each protected characteristic group, together with any additional actions that may be requested from staff that are in the scope of the consultation.

#### 4. EQUALITY IMPACT ASSESSMENT PROCESS

The EQIA has been undertaken by ensuring robustness and inclusivity; staff will be provided with an opportunity to comment on the transfer to the ICB during the formal 30 day consultation period. Following the closure of the formal consultation period, staff comments and feedback will be given due consideration to ensure that the CCG responds to the feedback and questions in a way that ensures fairness.

The following diagram summarises the CCG's approach to the EQIA process:



The purpose of the EQIA is to ensure that the potential impact of the proposed organisational change process for all staff in the scope of the consultation is identified and to reduce/mitigate any adverse impact and increase/safeguard positive impact for each protected characteristic group.

The EQIA has been undertaken by reviewing anonymised equality and diversity information of the staff in the scope of the consultation that is recorded on the electronic staff records (ESR) system at 19 April 2022.

## 5. EQUALITY IMPACT DATA ANALYSIS

This section analyses the likely impact of the transfer to the ICB on protected and disadvantaged groups. It should be noted that the CCG's default policy intent is to maximise opportunity (positive impact) for all groups by removing barriers to throughout the change process without any discrimination or bias. The following analysis has been undertaken with regard to all staff that are in-scope of the transfer to the ICB.

### 4.1 DATA PROFILE, ANALYSIS AND ACTIONS - AGE

Age Band	CCG Workforce (%)
21-30	7%
31-40	27%
41-50	31%
51-60	29%
61-70	6%
Total	100%

#### Age – Analysis and Actions

- Analysis: The majority of staff within the CCG are over the age of 41, with a greater proportion of staff within the 41-50 age bracket. The fewest staff are within the 21-30 age bracket.
- Action: No further action is required at this stage as the transfer will not have a negative/positive or disproportionate impact on staff within any of the age groups.

### 4.2 DATA PROFILE, ANALYSIS AND ACTIONS - DISABILITY

Disability	CCG Workforce (%)
No	78%
Yes	5%
Not Declared	15%
Prefer Not to Answer	1%
Unspecified	1%
Total	100%

#### Disability – Analysis and Actions

- Analysis: The majority of staff within the CCG have declared not to have a disability. A small number have declared to have a disability, whilst some have not declared or preferred not to answer the disability question on the diversity monitoring form.
- Action: Whilst the transfer will not have a disproportionate or negative impact on any staff member, there are several actions required to ensure that support is in place for staff with a disability/long term health condition during the consultation process:
  - Staff on long-term leave and in-scope of the consultation will be consulted with in line with the Change Management Policy (**Appendix 4**). The HR Team will work with line managers to ensure they keep staff on long-term leave updated and provided with all relevant information, including invitations to any staff briefings.

- Ensure reasonable adjustments for those staff with a disability/health condition or carers commitment to facilitate attendance to meetings/provision of feedback
- Provision of health and wellbeing support as a result of a disability/health condition via line manager and access to a full range of support, including occupational health and via the employee assistance programme.

#### 4.3 DATA PROFILE, ANALYSIS AND ACTIONS – ETHNIC GROUP

Ethnic Group	CCG Workforce (%)
White	54%
BAME	39%
Not Stated	7%
Total	100%

#### Ethnic Group – Analysis and Actions

- Analysis: The highest proportion of staff are from a White background. The ethnic breakdown of CCG staff is broadly reflective of the NCL population.
- Action: No further action is required at this stage as the transfer will not have a negative/positive or disproportionate impact on staff within any particular ethnic group.

#### 4.4 DATA PROFILE, ANALYSIS AND ACTIONS – GENDER

Ethnic Group	CCG Workforce (%)
Female	69%
Male	31%
Total	100%

#### Gender – Analysis and Actions

- Analysis: The CCG has a higher proportion of female staff.
- Action: No further action required at this stage as the transfer will not have a negative/positive or disproportionate impact on staff within any particular gender groups

#### 4.5 DATA PROFILE, ANALYSIS AND ACTIONS – GENDER RE-ASSIGNMENT

Information is not currently captured for this protected characteristic.

#### 4.6 DATA PROFILE, ANALYSIS AND ACTIONS – MARRIAGE AND CIVIL PARTNERSHIP

Marital Status	CCG Workforce (%)
Civil Partnership	2%
Divorced	5%
Legally Separated	1%
Married	48%
Single	39%
Unknown	5%

Widowed	0%
Total	100%

### Marriage and Civil Partnership – Analysis and Actions

- Analysis: The greatest proportion of CCG staff are married, followed by single marital status.
- Action: No further action is required at this stage as the transfer will not have a negative/positive or disproportionate impact on staff within any particular marital status group.

### 4.8 DATA PROFILE, ANALYSIS AND ACTIONS – PREGNANCY AND MATERNITY

Maternity Status	CCG Workforce (%)
Yes	1%
No	99%
Total	100%

### Pregnancy and Maternity – Analysis and Actions

- Analysis: A very small number of staff are on maternity, paternity or adoption leave.
- Action:
  - Staff on long-term maternity, paternity or adoption leave and in-scope of the consultation will be consulted with in line with the Change Management Policy (**Appendix 4**). The HR Team will work with line managers to ensure they keep staff on long-term leave updated and provided with all relevant information, including invitations to any staff briefings.

### 4.9 DATA PROFILE, ANALYSIS AND ACTIONS – RELIGION AND BELIEF

Religious Belief	CCG Workforce (%)
Atheism	16.3%
Buddhism	0.6%
Christianity	33.7%
Hinduism	5.8%
Not-disclosed	24.9%
Islam	7.4%
Jainism	0.8%
Judaism	1.8%
Other	7.8%
Sikhism	0.8%
Unspecified	0.1%
Total	100%

### Religion/Belief – Analysis and Actions

- Analysis: The largest proportion of staff with religious beliefs is Christianity, followed by those who did not declare their religious belief, followed by atheism.

- Action: No further action required at this stage as the transfer will not have a negative/positive or disproportionate impact on staff within any particular religious belief group

#### 4.10 DATA PROFILE, ANALYSIS AND ACTIONS – SEXUAL ORIENTATION

Sexual Orientation	CCG Workforce (%)
Bisexual	1%
Gay or Lesbian	4%
Heterosexual or Straight	75%
Not Disclosed	20%
Total	100%

#### Sexual Orientation – Analysis and Actions

- Analysis: Staff who are heterosexual or straight represent a more significant proportion of the CCG workforce, however, 1/5<sup>th</sup> of the workforce have not disclosed their sexual orientation.
- Action: No further action is required at this stage as the transfer will not have a negative/positive or disproportionate impact on staff within any particular sexual orientation group

### 6. OVERALL RECOMMENDATIONS AND NEXT STEPS

In summary, the following recommendations are proposed to support the consultation process:

- Staff on long-term leave or secondment and in-scope of the consultation will be consulted with in line with the Change Management Policy (**Appendix 4**). The HR Team will work with line managers to ensure they keep staff on long-term leave updated and provided with all relevant information, including invitations to any staff briefings.
- Ensure reasonable adjustments for those staff with a disability/health condition or carers commitment to facilitate attendance to meetings /provision of feedback
- Provision of health and wellbeing support as a result of a disability/health condition via line manager and access to a full range of support, including occupational health and via the employee assistance programme. Advice can be sought from the HR team.
- Building resilience workshops to support staff through change will also be available via the CCG's Learning Hub Intranet page.
- Staff briefings and a dedicated intranet page to continue as a means of communicating directly with staff and access to key documents.
- Advice and guidance is available from Trade Union representatives.
- Access to HR-Drop in sessions in order to meet with a member of the HR Business Partnering team if staff have any questions or would like information on the HR process. Dates and times are published on the HR drop-in sessions dedicated intranet page.

- Keep diversity staff networks and safe space conversation facilitators informed about the change process and consultation

## **7. NEXT STEPS**

We have not identified any adverse or disproportionate impact of the transfer from NHS NCL CCG to NHS NCL ICB on any protected characteristics. However, we are very aware of our duty as an employer, and we are committed to supporting our staff during this transition. We will, therefore, complete a post-consultation review of this equality impact assessment.