**BARNSLEY CLINICAL COMMISSIONING GROUP**

**Trans Equality in the Workplace Policy**

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| **Version:** | 1 |
| **Approved By:** | Equality & Engagement Committee |
| **Date Approved:** | 21 November 2019 |
| **Name of originator:** | HR Business Partner / Equality & Diversity |
| **Name of responsible committee** | Equality & Engagement Committee |
| **Name of executive lead:** | Richard Walker |
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### THIS POLICY HAS BEEN SUBJECT TO A FULL EQUALITY IMPACT ASSESSMENT DOCUMENT CONTROL

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**CONTENTS**

|  |  |  |  |
| --- | --- | --- | --- |
|  |  | | **PAGE** |
| **PART 1: POLICY** | | |  |
| **1.** | Introduction and The Law | | 4 |
| **2.** | Scope | | 4 |
| **3.** | Definitions | | 4 |
| **4.** | Purpose | | 5 |
| **5.** | Duties | | 6 |
| **6.** | Audit and Monitoring | | 6 |
| **7.** | Links to Other Policies | | 6 |
| **PART 2: PROCEDURE** | | |  |
| **1.** | Staff Considering Undergoing Gender Reassignment | | 7 |
| **2.** | Staff intending toUndergo Gender Reassignment | | 7 |
| **3.** | Staff Undergoing Gender Reassignment | | 8 |
| **4.** | Recruitment and New Starters | | 8 |
| **5.** | Work Permits | | 8 |
| **6.** | References | | 9 |
| **7.** | Occupational Requirements | | 9 |
| **8.** | Gender Recognition Certificates (GRC) | | 9 |
| **9.** | Confidentiality | | 9 |
| **10.** | National Insurance | | 10 |
| **11.** | Pension | | 10 |
| **12.** | Professional Registration | | 10 |
| **Appendix A** | | Undergoing Gender Reassignment Procedure | 11 |
| **Appendix B** | | Meetings Guide and Checklists | 13 |
| **Appendix C** | | Practical Procedures and Considerations | 15 |
| **Appendix D** | | Task List | 17 |
| **Appendix E** | | Advice on DBS Check Procedure | 18 |
| **Appendix F** | | Equality Impact Assessment | 19 |

**PART 1: POLICY**

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| **1.** | **Introduction** |
| 1.1 | It is the CCG’s intention that all staff, volunteers, applicants and members of the public who identify as Trans in any way, will experience respect and dignity as employees or potential employees or whilst undertaking roles in the CCG for example as volunteers or visitors. |
| 1.2 | It is also the intention of the CCG that managers have good information and guidance on Trans equality issues and on the implications for people considering or undergoing this process and that the CCG is committed to ensuring that Trans people are treated with respect and that it does not discriminate unlawfully. This commitment is an important aspect of its overall commitment to providing equal opportunities in employment. |
| 1.3 | This policy is intended to assist the CCG to put this commitment into practice and to help the CCG, Trans people and other employees to deal with any practical and / or compassionate issues that may arise. Compliance with this policy should also ensure that employees do not commit unlawful discrimination. |
| 1.4 | The Gender Recognition Act makes it a criminal offence to disclose protected information about a Trans person without permission if it was obtained in an official capacity. This applies to both direct (word of mouth) and indirect disclosure and therefore means that paper and computer records should be considered with care. The Data Protection Act (DPA) 2018 also means that information about an employee’s gender history or treatment should be regarded as sensitive information. The DPA applies whether they have obtained legal recognition or not. |
| 1.5 | Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment. The CCG has a separate Equality, Diversity & Inclusion policy that highlights these issues in more detail. |
| **2.** | **Scope** |
| 2.1 | The policy is CCG wide and applies to all people applying for employment and employed by the CCG, including those working in the CCG under honorary contracts, as contractors or volunteers. It is intended to apply to anyone within this group who is considered transitioning. |
| **3.** | **Definitions** |
| 3.1 | **Gender Dysphoria** |
|  | A term used by psychiatrists and psychologist to describe the condition trans people have – that is not feeling well or happy with their gender as assigned at birth, in terms of both their social role and their body. Gender dysphoria describes people who experience significant dysphoria (discontent) with the sex they were assigned at birth. |
| 3.2 | **Transgender or Trans Person** |
|  | A person whose gender identity does not conform to the sex they were assigned at birth. These are inclusive, umbrella terms, including people who describe themselves as transsexual, cross dressing people, and people who have a more complex sense of their own gender than either 100% female or 100% male.  ‘*Transgender*’ or ‘*Trans*’ (the latter is the preferred terminology) describes people whose gender identity differs from their sex assigned at birth. They are umbrella terms covering people who:   * Are intending to undergo, are undergoing, or have undergone gender reassignment at any stage; * Identify as having a gender different from that which they were assigned at birth and are planning or have had medical interventions such as hormone therapy or surgery; * Identify as having a gender different from that which they were assigned at birth, but who are not planning any medical intervention; and/or, * Are non-binary – that is, they are not solely male or female. They may define themselves as both, neither or something entirely different. They may or not have medical interventions to align their body with their non-binary gender identity.   These are not mutually exclusive alternatives. |
| **4.** | **Purpose** |
| 4.1 | The CCG is committed to equality of opportunity, preventing discrimination or harassment and promoting positive relations between all people employed in the CCG. It is the CCG’s intention that all staff, volunteers, applicants and members of the public considering or transitioning at any stage will experience respect and dignity.  The purpose of this policy is to set out:   * How the CCG will address these aims * How the CCG will address the Trans agenda from an employment perspective ensuring practice is in line with legal requirements and good practice guidance * How the CCG will ensure that Trans individuals are treated with fairness and supported in recruitment, employment, and career development * The CCG’s Policy on applying appropriate procedures in recruitment * The CCG’s Policy on applying appropriate procedures and support processes when employees or volunteers are considering, or transitioning at any stage * How the CCG will ensure that relevant members of staff have sufficient information and guidance and support so that they can provide sensitive and supportive management to people who have informed them that they are identifying as Trans or intending to do so at some point in the future * The action that will be taken by the CCG to ensure that Trans individuals are treated with respect and their legal rights are maintained. |
| **5.** | **Roles and Responsibilities** |
| 5.1 | All staff should be aware of the policy as it applies to them as individual members of staff or volunteers. All staff with leadership / managerial responsibilities must be aware of this policy and its related procedures and guidance and ensure that it is applied in their area of responsibility.  Specialist staff for example in areas such as HR, workplace wellbeing etc. should have a good working knowledge of the Policy and related procedures and guidance.  The HR & OD Business Partner and the Equality, Diversity & Inclusion Lead are responsible for ensuring the policy is up to date. |
| **6.** | **Audit, Monitoring and Review** |
| 6.1 | The policy will not be in regular use so it is anticipated that once the policy has been used for the first time feedback will be obtained from staff and managers regarding the policy.  The policy will be updated to take account of guidance issued on trans equality. The policy will be reviewed on a cyclical basis every three years. |
| **7.** | **Links to other policies** |
| 7.1 | Other NHS Barnsley CCG policies which should be read in conjunction are:  * Equality, Diversity and Inclusion Policy * Acceptable Standards of Behavior (incorporating Dignity at Work) * Managing Sickness Absence * Recruitment and Selection Policy and Procedure |

**PART 2: PROCEDURE**

|  |  |
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| **1.** | **Staff Considering Transitioning** |
| 1.1 | ‘Transitioning’ is the process undertaken by a Trans person in order to bring their gender presentation into alignment with their gender identity. This often involves dressing differently, using a different name and pronoun (e.g. she, he or they) and changing official documentation. It may involve various types of medical or surgical treatment, although this is not the case for all trans people. The CCG is committed to supporting each individual in their decisions. |
| 1.2 | Any member of staff identifying as Trans is advised to initially approach their line manager or HR Business Partner. The line manager or the HR Business Partner should ensure that the employee is provided with a copy of this policy and related procedures and support.  A member of staff considering undertaking transition may not proceed or may not plan to undergo gender reassignment imminently. |
| 1.3 | The line manager should agree with the member of staff what, if any, support will be helpful on an on-going basis and should discuss with the employee the support services available, including the Employee Assistance Programme. The line manager should ensure that if a person has raised the issue of transitioning with them that any record made or transfer of information is made only with the specific agreement of the employee. |
| 1.4 | Trans people should be protected from discrimination and harassment at all times, regardless of whether they choose to transition medically or not. Although the phrase ‘gender reassignment’ is used in the Equality Act 2010, it is now generally considered to be out-dated language. Both the Equality Act 2010 and the Gender Recognition Act 2004 are clear that gender reassignment need not involve any medical intervention. However, the phrase is widely misinterpreted to assume that it is a medical process, and this can feed myths and misunderstandings. |
| **2.** | Staff intending to transition |
| 2.1 | If the member of staff decides to transition, once they have had opportunity to review the policy they have the option to start the procedure set out in Appendix A.  The procedure in Appendix A sets out what should take place to support an employee considering transitioning. |
| **3.** | Staff transitioning |
| 3.1 | This section applies to employees, irrespective of the type of employment contract, undergoing gender reassignment. People transitioning who wish medical support are usually required by medical protocols to ‘live in role’ for up to two years. They may then be prescribed hormone therapy. They may then choose to undergo surgical procedures. Not all people who transition will wish to undergo surgical procedures. A person is legally protected even if they never seek medical treatment. |
| 3.2 | Absence from work due to transitioning must be treated in the same way as absence due to illness and take account of the CCG’s Sickness Absence policy. The manager should discuss with the member of staff what type of appointments or time off they will require associated with transitioning, and this must be provided for under the terms of the CCG sickness absence policy and management guidelines.  Appendix A sets out a procedure to be followed to support someone transitioning. |
| 3.3 | The CCG will maintain up to date information about support services available to a person undergoing gender reassignment and provide this information through the CCG intranet site – staff considering undergoing or undergoing gender reassignment should be signposted to this information. |
| **4.** | Recruitment and New Starters |
| 4.1 | Employment recruitment procedures and practice will include provisions for ensuring that people are not discriminated against in the recruitment process.  New and current employees requiring Disclosure Barring Service (DBS) checks who are transitioning will be able to use the DBS specific procedure. This involves contacting the DBS directly. CCG staff do not need information about a member of staff’s gender history and should not ask about this during DBS checking. |
| 4.2 | DBS internal procedures ensure that relevant checks are made. Where a conviction or (in Enhanced Disclosure cases) other relevant information has been recorded in a previous name, this will be revealed on the disclosure and as such details of any previous identity may become apparent.  See appendix E DBS check procedure |
| **5.** | Work Permits |
| 5.1 | Staff who are working in the CCG on a work permit or student visa are asked to comply with any work permit/visa regulations which may relate specifically to name change or gender reassignment in order that the work permit/visa continues to be valid. |
| **6.** | References |
| 6.1 | References for someone moving to a new job must be in the name which will be used in the new job and not disclose a former name. If a trans person has to disclose a previous identity in order for references from past employers to be obtained strict confidentiality and respect for dignity should be applied and this information kept secure. |
| **7.** | Occupational Requirements |
| 7.1 | The Equality Act 2010 has replicated exceptions for ‘occupational requirements’ that were in previous equalities legislation. The Equality Act 2010 makes it clear that any ‘occupational requirements’ for a role must *‘pursue a legitimate aim’* and *‘the burden of showing that the exception applies rests on those seeking to rely on it’.*  When advertising roles the CCG policy and procedure on advertising posts which have Occupational Requirements must be referred to. |
| 7.2 | When a person is considering transitioning it is essential that any concerns a line manager may have regarding the role of the trans person are discussed with the person as part of the procedures described in Appendix A. If agreement cannot be reached then advice should be taken from the HR Business Partner to agree if all or any part of the person’s role is subject to an occupational requirement. |
| **8.** | Gender Recognition Certificates (GRC) |
| 8.1 | This section applies to new recruits irrespective of the type of contract and to staff who have transitioned. The Gender Recognition Act 2004 provides that where a person holds a gender recognition certificate (GRC) they must be treated according to their acquired gender. |
| 8.2 | Anyone who has a GRC must be treated for all purposes as having their acquired gender. Trans people must not be routinely asked to produce a GRC. Staff transitioning may choose to apply for a GRC but they should not be required to do this.  People who have a GRC will be issued with a new birth certificate. This is confirmation of their legal gender. |
| **9.** | Confidentiality |
| 9.1 | The CCG’s policy on confidentiality will apply, however the following should be particularly noted. Members of staff may gain information about a person’s gender history in the course of their work. This information must be kept confidential. |
| 9.2 | If this information needs to be passed on then the specific permission of the person it relates to must be obtained. If this information is passed on without gaining the person permission, the person passing the information on will be committing an offence. |
| **10.** | National Insurance |
| 10.1 | Staff who change their name will need to inform the local social security office, providing the appropriate certificates and will pay NI contributions on the basis of their affirmed gender according to the GRC. |
| **11.** | Pension |
| 11.1 | A trans person who receives a full recognition certificate will be treated according to their affirmed gender for state pension purposes. Trans people who do not obtain a full gender recognition certificate retain their full pension rights in accordance with the sex that is recorded on their birth certificate. In terms of pension provision, it is good practice for employees to be treated as having their birth gender up to the point of transition (i.e. when they start to live fully in the acquired gender) and their acquired gender from the point of transition. This would apply for example in calculating funds transfers between pension plans. |
| **12.** | Professional Registration |
|  | Staff who are professionally registered are advised to contact their professional bodies to find out whether there are any specific requirements in terms of name changes etc. If the employer has to keep evidence of professional status or qualifications, he or she should discuss with the member of staff how to retain such evidence on file so as not to compromise or breach disclosure of protected information. |

### APPENDIX A

**UNDERGOING GENDER REASSIGNMENT PROCEDURE**

1. **Planning**

Each person transitioning or considering transitioning will have different preferences and priorities. The following procedures are intended to provide a framework to support this process but they may be modified to meet individual needs.

### Informing colleagues and other contacts

There is no requirement and there should be no obligation to inform colleagues, clients or the public that a person is transitioning.

Where case work is being undertaken or a member of staff has a long term caring relationship it may be considered appropriate to have a discussion with the service user if the relationship with that individual was established prior to their change of gender and is to continue. How to manage this should be discussed with the transitioning person.

Any inappropriate release of information resulting in the member of staff being identified against their stated wish, whether internally or externally, may be regarded as gross misconduct and subject to appropriate disciplinary action. It is therefore important to have a specific discussion at an early stage about who will be informed, at what stage and how.

It is recommended that the Transitioning person takes the lead in informing others but they may prefer that this is undertaken by the manager or a HR & OD Business Partner. It is important the timing of disclosure is agreed as part of the planning

The manager will ensure that general information about gender change and any specific details about the current transition are made available.

At the point of public change in gender, it is common for people to take annual leave and then return in their new name and gender role. This may be a useful opportunity with the person’s consent to brief staff ready for their return.

### Record keeping

At the point of transition all public documents, public references (such as telephone directories, e-mail accounts, circulation lists, rotas, Electronic Staff Records) and employment details need to be amended to reflect the acquired gender of the person. See Section 2 for practical details.

Where documents have been seen and copies taken at the point of starting employment (such as a birth certificate) every effort should be made to replace those with equivalent documents in the new name and gender. This will prevent any breach of confidentiality.

In some instances, it may be necessary to retain records relating to an individual’s identity at birth, for example, for pension or insurance purposes

Once a GRC has been obtained these must be replaced with the new birth certificate details.

Access to records showing the change of name and any other details associated with the individual’s status (such as records of absence for medical treatment) must be restricted to staff who need the information to do their work.

### APPENDIX B

**MEETING GUIDES AND CHECKLIST**

|  |  |  |
| --- | --- | --- |
|  |  | **DATE COMPLETED** |
| **INITIAL MEETING** | **SUGGESTED AGENDA:**   * Agree who will initially be informed and or involved in supporting the employee * Provide employee with details of the policy and CCG procedure * Agree a date for a second meeting – this should take place as soon as possible * What support would be helpful? – agree how this can be met. |  |
| **PLANNING MEETING 1** | **SUGGESTED AGENDA:**   * Agree outline timescales including support/progress meeting timetable * Agree who should/needs to be told when and how * Does the person wish to stay in their current role during transition or be redeployed? * Are there any occupational requirements of the current or proposed role (NB these will be limited and must be objectively justified by the CCG)? * Can adjustments be made so that the person does not undertake these aspects of the role during transition? * Where a role requires on going contact with individual patients/service users discuss communication with these patients. |  |
| **PLANNING MEETING 2** | **SUGGESTED AGENDA:**   * Does the person wish to inform colleagues, external organisations and contacts personally, or should this be done on their behalf? * Agree how the tasks identified in task list 1 below will be completed (who when etc.) * When will use of chosen gender facilities begin? * How will negative or hostile reactions be managed? * Agree how to respond to any media interest * Does any information need to be provided to colleagues? * Agree final timetable for when key actions will take place * Discuss any concerns of the transitioning person * Discuss any questions the line manager may have. |  |
| **PROGRESS MEETING 1** | **SUGGESTED AGENDA:**   * Review Progress * Check list of tasks 1 complete * Review/revise timetable. |  |
| **FURTHER PROGRESS MEETINGS** | To take place in line with planning identified above  **SUGGESTED AGENDA:**   * Review Progress * Review/revise timetable. |  |
| **FINAL MEETING** | This should take place at a stage when the transitioning person feels that support should finish or alternative on- going support should be agreed and all tasks have been completed. |  |

### APPENDIX C

**PRACTICAL PROCEDURES AND CONSIDERATIONS**

1. **Electronic Staff Record (ESR)**

This is the system used in the NHS to keep staff records.

**OPTION 1: Preferred name**

A member of staff can change their preferred name on the system without providing any supporting information, so someone whose name is Peter Smith could indicate that they wish to be known as Petra Smith. If someone’s preferred name is changed on the system any official information linked to ESR records will still record the person’s name as Peter Smith, HR Business Partner in this case.

To action this, a Request to Vary a Contract form needs to be completed and returned to the Central HR Workforce Team.

**Option 2: Initiating a full change of name**

Any member of staff can change their name but the CCG policy is that this must be supported by some formal proof of name change (for example a marriage certificate). For people transitioning the requested name change should be supported by a ‘statutory declaration’ of name change or a gender recognition certificate.

A name change can be facilitated by the person completing a Request to Vary a Contract electronic form which their line manager will then authorise. This should then be sent to the Central HR Workforce Team along with the scanned in copy of the ‘statutory declaration’ confirming this legal change.

### Email log in etc.

The IT department should be contacted to facilitate name changes on e-mail and any security or other log in systems.

### National Insurance

Staff who change their name will need to inform the local social security office, providing the appropriate certificates and will pay NI contributions on the basis of their affirmed gender according to the GRC.

### Pension

A trans person who receives a full recognition certificate will be treated according to their affirmed gender for state pension purposes. Trans people who do not obtain a full gender recognition certificate retain their full pension rights in accordance with the sex that is recorded on their birth certificate. In terms of pension provision, it is good practice for employees to be treated as having their birth gender up to the point of transition (i.e. when they start to live fully in the acquired gender) and their acquired gender from the point of transition. This would apply for example in calculating funds transfers between pension plans.

### Professional Registration

Staff who are professionally registered are advised to contact their professional bodies to find out whether there are any specific requirements in terms of name changes etc. If the employer has to keep evidence of professional status or qualifications, he or she should discuss with the member of staff how to retain such evidence on file so as not to compromise or breach disclosure of protected information.

**APPENDIX D**

**TASK LIST**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  | **WHO WILL COMPLETE** | | |  |
| **TASK** | **PROCESS** | **Staff Member** | **Manager** | **Other** | **COMPLETED** |
| Change name on ESR | * Complete Request to Vary a Contract Form * Submit to Central HR Team | **X** | **X** | HR Team will action on ESR upon receipt of form. |  |
| Change email address | * Contact IT directly to request change to email | **X** | **X** | IT Team will action on receipt of request. |  |
| Change name on IT systems | * Contact IT directly to request change | **X** | **X** | IT Team will action on receipt of request. |  |
| Advise Professional Body (as per policy) | * Staff member to contact relevant professional CCG. | **X** | n/a | n/a |  |
| Change authorised signature mandate | * CCG Finance to agree change and inform HR Central Team. | **X** | **X** | CCG  Finance Team to action change. |  |
| Change Payroll | * Will be actioned via Request to Vary a Contract instruction to Central HR Workforce Team as above. | **X** | **X** | HR Central Team will action on ESR upon receipt of form. |  |
| Order new Uniforms | * Staff Member /Manager | **X** | **X** | n/a |  |
| Inform National Insurance Office | * Staff Member to inform the office directly | **X** | n/a | n/a |  |

**APPENDIX E**

**ADVICE ON DBS CHECK PROCEDURE**

A specific procedure is available for people who are transitioning. This involves them contacting the DBS directly.

Applicants may telephone the DBS on 0151 676 1509 or 0151 676 1570 to discuss this matter in confidence.

A brief summary of the process is:

* + Trans people applying for a DBS disclosure should first ring one of the above numbers to clarify anything they are not sure about and to ensure that the DBS know they will be using the special provisions.
  + They should then complete the form presented by their employer in the normal way, except that they need not complete details (or supply forms of evidence) that would expose their gender history to their employer.
  + If they wish to leave out details that could ‘out’ them, then they should photocopy the form ensuring they have a clear record of the application serial number.
  + The applicant should then immediately contact the DBS on one of the numbers above and notify them of the application number.
  + The special security section of the DBS in Liverpool then have the means to intercept the application forwarded by the employer. They will ask the applicant to supply the information needed to replace that which was omitted. This is then married up so that a rigorous criminal records check can be carried out in the same way as for any other applicant.
  + Disclosures sent to the employee and their employer will not reveal the applicants former identity unless they have an offence or caution that has been recorded in that name in police records. In this case there is no way of avoiding the disclosure of that former identity to the employer.
  + DBS check information obtained should be treated in line with the CCG policy on DBS checks, data protection and confidentiality.



**Equality Impact Assessment**

|  |  |  |
| --- | --- | --- |
| **Title of policy or service:** | Trans Equality in the Workplace Policy | |
| **Name and role of officer/s completing the assessment:** | Colin Brotherston-Barnett - Equality, Diversity & inclusion Lead | |
| **Date of assessment:** | 10/10/2019 | |
| **Type of EIA completed:** | **Initial EIA ‘Screening’ X *or*  ‘Full’ EIA process** ☐ | *(select one option )* |

|  |  |
| --- | --- |
| **1. Outline** | |
| **Give a brief summary of your policy or service**   * including partners, national or regional | The Trans Equality Policy aims to provide an appropriate framework within NHS Barnsley CCG to enable managers to ensure employees who are transitioning or are considering transitioning are fully supported in the workplace.  It is the CCG’s intention that all staff, volunteers, applicants and members of the public who are transitioning or considering transitioning will experience respect and dignity as employees or potential employees or whilst undertaking roles in the CCG for example as volunteers.  This policy has been developed to ensure the CCG meets its legislative requirements in relation to transitioning under the provision of the Equality Act 2010, specifically ‘the act provides protection for transsexual people. A trans person is someone who proposes to, starts or has completed a process to change his or her gender. The act no longer requires a person to be under medical supervision to be protected, so a woman who decides to live as a man, but does not undergo any medical procedure would be covered. It is discrimination to treat trans people less favourably for being absent from work because they propose to transition than they would be treated if they were absent for being ill or injured.’ |
| **What Outcomes do you want to achieve** | That managers have good information and guidance on trans equality issues and on the implications for people considering or undergoing this process and that the CCG is committed to ensuring that trans people are treated with respect and that it does not discriminate unlawfully.  That this policy assists the CCG to put this commitment into practice and to help the CCG, trans people and other employees to deal with any practical issues that may arise. Compliance with this policy should also ensure that employees do not commit unlawful discrimination. |
| **Give details of evidence, data or research used to inform the analysis of impact** |  |
| **Give details of all consultation and engagement activities used to inform the analysis of impact** |  |

**Identifying impact:**

* **Positive Impact:** will actively promote the standards and values of the CCG.
* **Neutral Impact:** where there are no notable consequences for any group;
* **Negative Impact:** negative or adverse impact: causes or fails to mitigate unacceptable behaviour. If such an impact is identified, the EIA should ensure, that as far as possible, it is eliminated, minimised or counter balanced by other measures. This may result in a ‘full’ EIA process.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **2. Gathering of Information**  This is the core of the analysis; what information do you have that might *impact on protected groups, with consideration of the General Equality Duty*. | | | | | |
| **(Please complete**  **each area)** | **What key impact have you identified?** | | | **For impact identified (either positive**  **or negative) give details below:** | |
| **Positive**  **Impact** | **Neutral**  **impact** | **Negative**  **impact** | **How does this impact and what action, if any, do you need to take to address these issues?** | **What difference will this make?** |
| **Human rights** | **X** | ☐ | ☐ |  |  |
| **Age** | ☐ | **X** | ☐ |  |  |
| **Carers** | ☐ | **X** | ☐ |  |  |
| **Disability** | ☐ | **X** | ☐ |  |  |
| **Sex** | ☐ | **X** | ☐ |  |  |
| **Race** | ☐ | **X** | ☐ |  |  |
| **Religion or belief** | ☐ | **X** | ☐ |  |  |
| **Sexual orientation** | ☐ | **X** | ☐ |  |  |
| **Gender reassignment** | **X** | ☐ | ☐ |  | Most employers are aware of the need to show a positive approach to trans people and other groups with ‘protected characteristics’. An accepting environment in which diversity is celebrated ensures that valuable staff are recruited and retained.  Yet at present 40% (1) of the people who would like to transition feel unable to do so in the work environment, and are therefore working under great stress and unlikely to reach their potential.  Providing a welcoming environment, in which valuable staff are recruited and retained benefits everybody, not just the groups specifically targeted.  The Equality Act 2010 strengthened and unified existing laws that protect trans people, and the development of this policy represents NHS Barnsley CCG’s commitment to ensuring the benefits and requirements of this law are clearly understood and followed within the CCG, and that staff who may wish to transition are aware they can do so with the assurance that their employer has a clear and supportive process in place. |
| **Pregnancy and maternity** | ☐ | X | ☐ |  |  |
| **Marriage and civil partnership** (only eliminating discrimination) | ☐ | X | ☐ |  |  |
| **Other relevant groups** | ☐ | ☐ | ☐ |  |  |

***IMPORTANT NOTE:*** *If any of the above results in ‘****negative’*** *impact, a ‘full’ EIA which covers a more in depth analysis on areas/groups impacted must be considered and may need to be carried out.*

Having detailed the actions you need to take please transfer them to the action plan below.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **3. Action plan** | | | | |
| **Issues/impact identified** | **Actions required** | **How will you measure impact/progress** | **Timescale** | **Officer responsible** |
|  |  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **4. Monitoring, Review and Publication** | | | | |
| **When will the proposal be reviewed and by whom?** | **Lead / Reviewing Officer:** |  | **Date of next Review:** |  |

Once completed, this form **must** be emailed to the Equality Lead [barnsleyccg.equality@nhs.net](mailto:barnsleyccg.equality@nhs.net) for sign off:

|  |  |
| --- | --- |
| **Equality Lead signature:**  **Date:** | Colin Brotherston-Barnett  10/10/2019 |