

**BARNSELY CLINICAL COMMISSIONING  
GROUP**

**FREEDOM OF INFORMATION POLICY**

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## **Freedom of Information Policy**

### **1. Introduction**

Barnsley Clinical Commissioning Group (BCCG), as a public body, has a duty to comply with all aspects of the Freedom of Information Act 2000. The Freedom of Information Act came into force at the beginning of 2005, and deals with access to information held by public bodies, while parallel regulations deal with environmental information. The Act provides individuals or organisations with the right to request information held by a public authority.

### **2. Purpose**

The aim of this policy is to:

- Ensure all Freedom of Information requests are dealt with consistently and receive a high quality response however and wherever the contact is made;
- Ensure that BCCG complies with all relevant regulations, laws and guidance;
- Provide clear routes for members of the public to make contact with the organisation so that they can appropriately request documents and information;
- Ensure that our Publication Scheme is up to date and inclusive in order to provide access to information and to lessen the number of written requests the public have to make and the impact on the service;
- Ensure that the necessary administrative infrastructure is in place for the Act to be complied with;
- Ensure staff at all levels are aware of their responsibilities with regard to the Act, be it in directing any Freedom of Information queries in the correct direction, or in ensuring they provide any information requested in a timely manner;
- Ensure timescales are met;
- Ensure the Governing Body is fully informed on the operation of the Act and any implications to the service.

### **3. Definitions**

3.1 **'The Act'** Refers to the Freedom of Information Act 2000.

3.2 **'FOI'** is an acronym for Freedom of Information.

3.3 **'DPA'** is an acronym for the Data Protection Act 1998.

3.4 **'ICO'** is an acronym for the Information Commissioner's Office. This is the UK's independent authority set up to promote access to official information and to protect personal information. The ICO covers Data Protection, Freedom of Information, privacy and electronic communications and the Environmental Information Regulations.

- 3.5 **‘Exemption’** Provisions within the Act that define particular types of information that public bodies are not obliged to disclose. Exemptions can either be absolute or qualified, see appendix 4.
- 3.6 **‘Public Interest Test’** The test a public body must apply if it feels the information requested falls under a qualified exemption
- 3.7 **‘Publication Scheme’** BCCG has a legal duty to compile and to make available a list of documents that it has in its possession and that it will routinely and proactively provide to the public. This is called a ‘Publication Scheme’. BCCG’s Publication Scheme can be found on the BCCG external website. BCCG can also make this available in hard copy should a member of the public not have access to computerised equipment.
- 3.8 **‘Duty to Confirm or Deny’** In some circumstances it may be appropriate to neither confirm nor deny whether information is held because to confirm or deny the existence of information would itself communicate sensitive and potentially damaging information, to the detriment of the public good.

#### 4. **Scope**

- 4.1 This policy applies to all information held by BCCG. This will not include non-official communications, but documents created by members of staff in the course of their duties will fall within the Act. Staff should be aware that even personal e-mails could be caught within the Act where they refer both to personal matters and also to the duties of that employee.
- 4.2 The information can be held in any form, including recordings or notes of telephone calls, file notes, the web and any other service that BCCG will introduce in the future.
- 4.3 All BCCG staff should have an understanding of this policy in order to direct enquirers appropriately.

#### 5. **What constitutes a Freedom of Information Request?**

In order for a request to fall under the auspices of FOI, the Act sets out certain criteria that it must meet:

- It must be made in writing (Letter, Fax, E-mail)
- It must state the name of the applicant and provide an address for correspondence. (Note this can be merely an e-mail address)
- It must describe the information requested.

It is important to note that the Act does not specify that the person making the request needs to mention Freedom of Information within their request; therefore something could be an FOI request, even though the requestor makes no mention of the Act.

It is also important to make a distinction between requests for information and routine correspondence. Requests for information that can be provided without any question (recruitment brochures, press releases, leaflets) should be treated as business as usual.

Similarly requests that are not for recorded information but which pose questions (please explain your policy on Y, why do you do X?) should be treated as routine correspondence. Where it appears that the enquirer thought they were applying for information under the Act, please note in any correspondence: "The Freedom of Information Act 2000 gives a right to the public to access information held by public bodies. However, your letter dated [add] sought an explanation of [add] rather than a copy of information held by us. If you would like to make a request for information under the Freedom of Information Act 2000 please submit a request in writing, clearly identifying the documents or information that you require and supplying a return address for the delivery of the information."

## **6. The Publication Scheme**

The Freedom of Information Act imposes a duty on every public body to produce and regularly maintain a publication scheme. Publication schemes are structured collections of information released routinely, organised into classes of information which make it easier for members of the public to find the information they require. The information listed in the CCG's Publication Scheme can be read and downloaded free of charge. If the member of the public does not have access to the Internet, a printed copy of this Publication Scheme can be sent to them free of charge. In some cases a fee may be levied, such as if they require multiple copies of a document or they have requested the information in a certain format.

If a request is received and the information is already published on the CCG's Publication Scheme the requestor will be redirected to the information on the Publication Scheme.

## **7. Data Protection Act 1998**

Where an enquirer asks for information held about themselves, this is covered by the DPA and not the Act. However, even if the written request refers to the Act (or does not refer to either the Act or the DPA) it should be dealt with under the Data Protection Act 1998.

## **8. Roles and Responsibilities**

- 8.1 The Chief Officer has overall accountability for the management of BCCG's response to enquiries under the Act.
- 8.2 The Governing Body is responsible for approving the CCG's FOI Policy.
- 8.3 The Head of Governance and Assurance has responsibility for the operational management of FOI and will provide leadership in terms of how specific requests should be dealt with.
- 8.4 Managers and staff are responsible for ensuring that all enquirers receive the right information about accessing our Publication Scheme and how to apply for information should it not be available online.
- 8.5 All staff are required to work with the Freedom of Information team to ensure that any information requested from them in relation to an enquiry under the Act is supplied well within the timescales allowed.

## 9. Procedure for dealing with telephone enquiries

If a member of staff receives a telephone call regarding an enquiry:

- 9.1 Under FOI they should advise the caller that they **must** write or e-mail in to one of the addresses below.
- 9.2 The Act makes it a requirement that all requests for information should be made in writing. The enquirer should be asked to ensure they clearly identify the documents or information that they require, and to ensure that they supply a return address for the delivery of the information.

By Post:

FOI - NHS Barnsley Clinical Commissioning Group, 49/51 Gawber Road, Barnsley, South Yorkshire S75 2PY

By email: [BARNCCG.FOI@nhs.net](mailto:BARNCCG.FOI@nhs.net)

## 10. General Procedure for the receipt of a written request

- 10.1 BCCG has two working days to acknowledge receipt of the request, and 20 working days, from date after receipt of the request, to provide the response. A working day is defined by the ICO as Monday to Friday (Saturdays, Sundays and Bank Holidays are not classed as working days)
- 10.2 As the clock begins ticking from the moment a request is received by BCCG, it is essential that any written FOI requests received by the organisation be forwarded as directly and as quickly as possible to the FOI team.
- 10.3 When a written request is received, the details must be entered immediately into the FOI register (database).
- 10.4 The FOI Administrator needs to then make a decision as to the validity of the request and that he/she has enough information to be able to provide the documents/information requested.
- 10.5 Once the register is complete, and the issues in 10.4 have been considered, an acknowledgement needs to be sent to the enquirer.
- 10.6 If the FOI Administrator deems the request to be invalid or that they need further information to be able to complete the request then this should be noted to the requestor as soon as possible. If it is the case that the request requires further clarification then the 20 working days time limit will pause when the requestor is notified, and will not restart until a clarified response is received from the enquirer. If no clarification is received from the enquirer within 3 months then the FOI Administrator will deem this request closed. However, if the enquirer responds at a later date the information request will be deemed to be re-opened and the running of the 20 working day period will restart.
- 10.7 The FOI Administrator will establish through enquiry the most appropriate person to respond to the request and will forward the FOI request to this person for completion (see appendix 6 for list of CCG FOI Contacts) or direct the requestor to the CCG's Publication Scheme where the requested information is already in the public domain.

- 10.8 The FOI Administrator will then monitor the return of the information from the relevant directorates, sending out reminders, on a regular basis, to the departments concerned if nothing has been received.
- 10.9 On receipt of the information the Head of Governance and Assurance will determine if any exemption applies.
- 10.10 Any non-exempt information should be sent to the enquirer, using the medium they requested if possible. The enquirer should be informed of their right to complain if they are not happy with the response received. The register must then be completed.

## **11. Transferring a request**

- 11.1 When information requested is not held by the CCG, the CCG will identify who holds the information and advise the applicant to apply to that authority. Contact details of the relevant FOIA/EIR section should be provided in the response. However, all or part of a request can also be transferred to another public authority. A transfer should only occur if it has been established that the other authority does hold the information concerned.

## **12. Responding to a request when an exemption is used to block the disclosure of information**

- 12.1 When it is felt that information should not be provided, the manager concerned should discuss with the FOI Administrator to see which, if any, exemptions can be used. If necessary, legal advice should be sought for the decision.
- 12.2 If it is felt that a qualified exemption applies, then the 'public interest test' must be applied, see section 13.
- 12.3 If the manager concerned thinks it is appropriate to use an exemption to withhold some or all of the information requested then they should endeavour to inform the FOI Administrator within 2 working days of the initial request, to ensure that there is sufficient time remaining within the 20 working day timeframe for discussions around exemptions, contacting relevant third parties to canvas their views, applying the public interest test, or taking legal advice.

## **13. The Public Interest Test**

- 13.1 Where a qualified exemption applies to information that has been requested, public authorities are required to carry out a 'public interest test'. This requires weighing the public interest considerations in favour of release of the information and the public interest considerations in favour of protecting it from disclosure. If the public interest in withholding the information outweighs the public interest in disclosure, it should be withheld. Where the interests are evenly balanced, the Information Commissioner would usually expect the information should be disclosed. Where a public interest test under FOIA needs to be conducted the CCG is entitled to apply for extra time, up to a further 20 working days

## **14. Complaints and/or requests by the enquirer for a review of the request**

- 14.1 There needs to be a clear demarcation between complaints about the handling of a request, and requesting a review of the decision re: an FOI request.

### **Complaints about the handling of request**

- 14.2 If the enquirer wishes to make a complaint about the FOI Administrator and/or the way in which their request was handled where the complaint relates to the enquirer not having been given proper advice and help or not being given the information within 20 days the requestor can submit a complaint to Head of Governance and Assurance, Barnsley CCG, FOI Team, Hillder House, 49 – 51 Gawber Road, Barnsley, S75 2PY, quoting the reference number of the request. At the conclusion of the complaint and feedback the enquirer must be informed that they have a right to complain to the Information Commissioner.

### **Complaints relating to a review of a decision**

- 14.3 If the enquirer wishes to ask for an internal review specifically of the information provided or of the decision to exempt some or all of the information then the request should be made in writing to the FOI Administrator who will ensure that an internal review is instigated.
- 14.4 The review must be conducted by a staff member who was not involved in the original decision whether to release the information. Ideally the review should be conducted by a Director.
- 14.5 The internal review stage is an opportunity to consider a case completely afresh and should be a fair and impartial review of decisions made during the original consideration of whether to release information.
- 14.6 The timescale for an internal review is 20 working days from the time the request for a review came in.
- 14.7 Whatever the outcome of the review, the enquirer must be advised of the decision.
- 14.8 If the internal review overturns the original decision to withhold information, the said information should be released to the enquirer as soon as possible after the internal review is completed.
- 14.9 If the internal review upholds the original decision to withhold information, then BCCG is not obliged to undertake any further review. However the enquirer must be apprised of their right of appeal to the Information Commissioner.
- 14.10 It is important that full records are kept on the progress of the review and any outcomes as a result of the review. This will assist in any further investigations by the Information Commissioner.

## **15. Personal Information and medical records**

- 15.1 Requests by an enquirer for their own personal information (as defined by the DPA) and medical records will not be disclosed under this procedure. These requests will be dealt with under the CCG's Subject Access Requests procedure.

- 15.2 All other requests for personal information of the enquirer will be dealt with under the DPA.

## **16. Re-use regulations**

- 16.1 If there are concerns about information reaching a wider audience, without sufficient briefing relating to the circumstances surrounding the production of the data/document, or its context, then the CCG may indicate that the information is being supplied only for the use of the initial enquirer, and cannot be re-used or reproduced in any format, or relayed on to other people, without the consent of the CCG.

## **17. Copyright**

- 17.1 Any information supplied under FOI continues to be protected by the Copyright, Designs and Patents Act 1988. A copy of the below wording must be included whenever information is released under FOI.

- 17.2 Re-use of Public Sector Information

All information supplied by the CCG in answering a request for information (RFI) under the Freedom of Information Act 2000 or Environmental Information Regulations is the copyright of Barnsley Clinical Commissioning Group and is subject to the terms of the Re-use of Public Sector Information Regulations 2005, Statutory Instrument 2005 No.1515 which came into force on 1<sup>st</sup> July 2005.

Under the terms of the Regulations, the CCG will not license the re-use of any or all information supplied if it is being used in a form and for a purpose other than which it was originally supplied.

This license for re-use will be in line with the requirements of the Regulations and the licensing terms and fees as laid down by the Office of Public Sector Information (OPSI). Most licenses will be free; however the CCG reserves the right, in certain circumstances, to charge a fee for the re-use of some information which it deems to be of commercial value.

Further information and sample license terms and fees can be found with guidance on copyright and publishing notes and a Guide to Best Practice and regulated advice and case studies, at:  
[www.opsi.gov.uk/advice/psi-regulations/index.htm](http://www.opsi.gov.uk/advice/psi-regulations/index.htm)

## **18. Charging**

- 18.1 The CCG will not normally charge for the provision of information that is provided as a result of an FOI request. However, the CCG have a right to refuse a request or make a charge, where the cost and staff time of meeting that request would be too high and a strain on the resources of the CCG. This point is known as the appropriate limit. The appropriate limit is where a request can be regarded as excessive and the criteria for dealing with such a request are defined within the

FOIA and associated legislation. This limit is calculated at a standard of £25 per hour multiplied by 18.5. If a request is estimated to take greater time than 18.5 hours the request can be refused or a fee raised on the requestor. The fee would be calculated at £25 for each hour over the first 18.5 hours.

18.2 However where a charge is applicable the FOI team will send the applicant a Fees Notice where the estimated cost of all such disbursements is detailed. The request will be placed on hold by the team until the applicant has paid the fee and the payment has been cleared. Once payment has been received and cleared, the 20 working day clock will be restarted from where it was stopped and the response prepared by the FOI team with information the CCG will already have located. If payment is not received within 3 months of the date of the Fees Notice for FOIA requests and 60 working days in the case of EIR requests, the request will be closed by the FOIA team.

18.3 Wherever possible BCCG will work with the enquirer to try to reduce the amount of work involved so that some of the information can be provided. In certain circumstances BCCG can offer the enquirer the option of paying for the information.

## **19. Duty to assist**

19.1 All public bodies have a duty to assist enquirers in the quest for information. Therefore whilst asking that their request be specific, BCCG staff must also ensure that we enter into some dialogue with the enquirer where requests are made that are broader than we would be able to deal with, in order to identify the correct information. This could include, for instance, suggesting information that is available and where we think they may be asking for the wrong data. In cases where we do not hold the information requested we should give them contact details for other organisations if we are aware of the information being held elsewhere.

## **20. Special Circumstances**

20.1 Although FOI requests should be received in writing, special circumstances may arise where members of the public are unable due to a disability or illness. In these cases, the FOI officer is able to write the request on behalf of the member of the public.

## **21. Data Protection Act 1998 and the NHS**

21.1 Many people contacting BCCG do not understand the difference between the Freedom of Information Act 2000 and the Data Protection Act 1998. The FOI Administrator will undertake to explain these differences to enquirers where appropriate in a helpful manner and will do their best to assist the person in finding the right regulations or organisation to provide the information required.

21.2 If somebody applies for information under the wrong Act, BCCG will inform the enquirer and give them guidance on the purpose of the

various Acts. The request will still be acknowledged but will be dealt with under the correct Act.

## **22. Environmental Information Regulations (EIR)**

- 22.1 These regulations give members of the public the right to access environmental information held by public authorities. The request can be made by letter, email, telephone or in person.
- 22.2 EIR requests should be directed to the FOI Administrator in the same way as FOI requests. The time limit for responding to an EIR request is 20 days however, The CCG can extend the time for compliance by an additional 20 working days to allow it more time to respond to complex requests.

## **23. Audit Process**

Regular reports will be submitted to the Information Governance Group and Quality and Patient Safety Committee. This report will detail the number of FOI requests submitted, the number where information is provided and the number where an exemption is used. This report will also detail average and maximum time taken to fulfill a request. In addition random audits may be carried out on departments as part of a wider mystery shopper programme to ensure that awareness of the FOI process is engrained within the culture of BCCG.

## **24. Records Management Retention of FOI Requests**

FOI requests should be retained for a minimum of three years where full disclosure has been made. If the information requested is not disclosed, or is in anyway redacted, then the request should be retained for 10 years.

## **25. Training**

All FOI officers will receive training on current legislation, BCCG's FOI procedure and on use of the supporting IT systems. Support will be given by the FOI Lead Officer. If there are further training needs required this can be looked at on an individual basis.

## **26. Policy Review**

This policy will be updated bi-annually, or in the event of any significant guidance or policy change within BCCG, from the Department of Health, or from the Information Commissioner's Office. Minor updates will be approved by the IG Group and the Quality and Patient Safety Committee and more significant rewrites will be approved by the Governing Body.

## **The Quick Guide to Freedom of Information**

### What is the Freedom of Information Act?

- The Freedom of Information Act (the Act) applies to all public bodies.
- The Act deals with access to information held by public bodies.
- Individuals or organisations have the right to request information held by BCCG.
- If we hold the information we must supply it within 20 working days.
- Failure to supply information could lead to sanctions being taken against BCCG.

### What constitutes an FOI query?

- Any request for information held by BCCG that is made in writing via letter, fax, or email. Requests **cannot** be made over the phone.
- The request can come from absolutely anyone but it must have a return address/email address.
- Where the request relates to information about the enquirer, this should be dealt with as a request under the Data Protection Act.

### Some examples of FOI queries

Accounts – Governing Body Minutes – Organisational Structures – Performance statistics – Contact details of senior managers – Policy documents – Number of complaints – Annual expenditure...

### What to do if you think you've got an FOI request?

If it is over the telephone then advise the caller that they **must** write or email in to one of the addresses below (you cannot do it for them!):

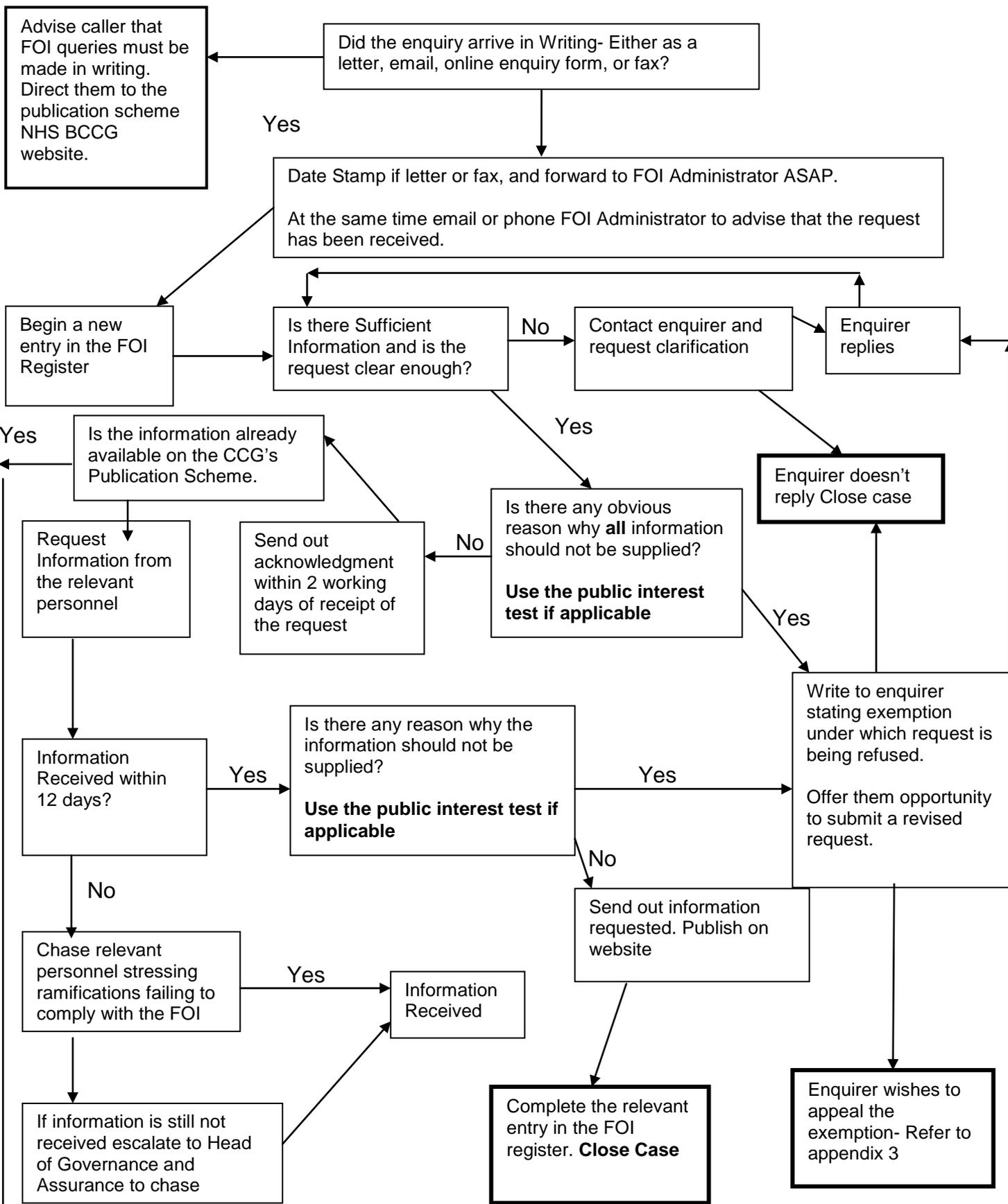
By Post:

FOI - NHS Barnsley Clinical Commissioning Group, 49/51 Gawber Road, Barnsley, South Yorkshire S75 2PY

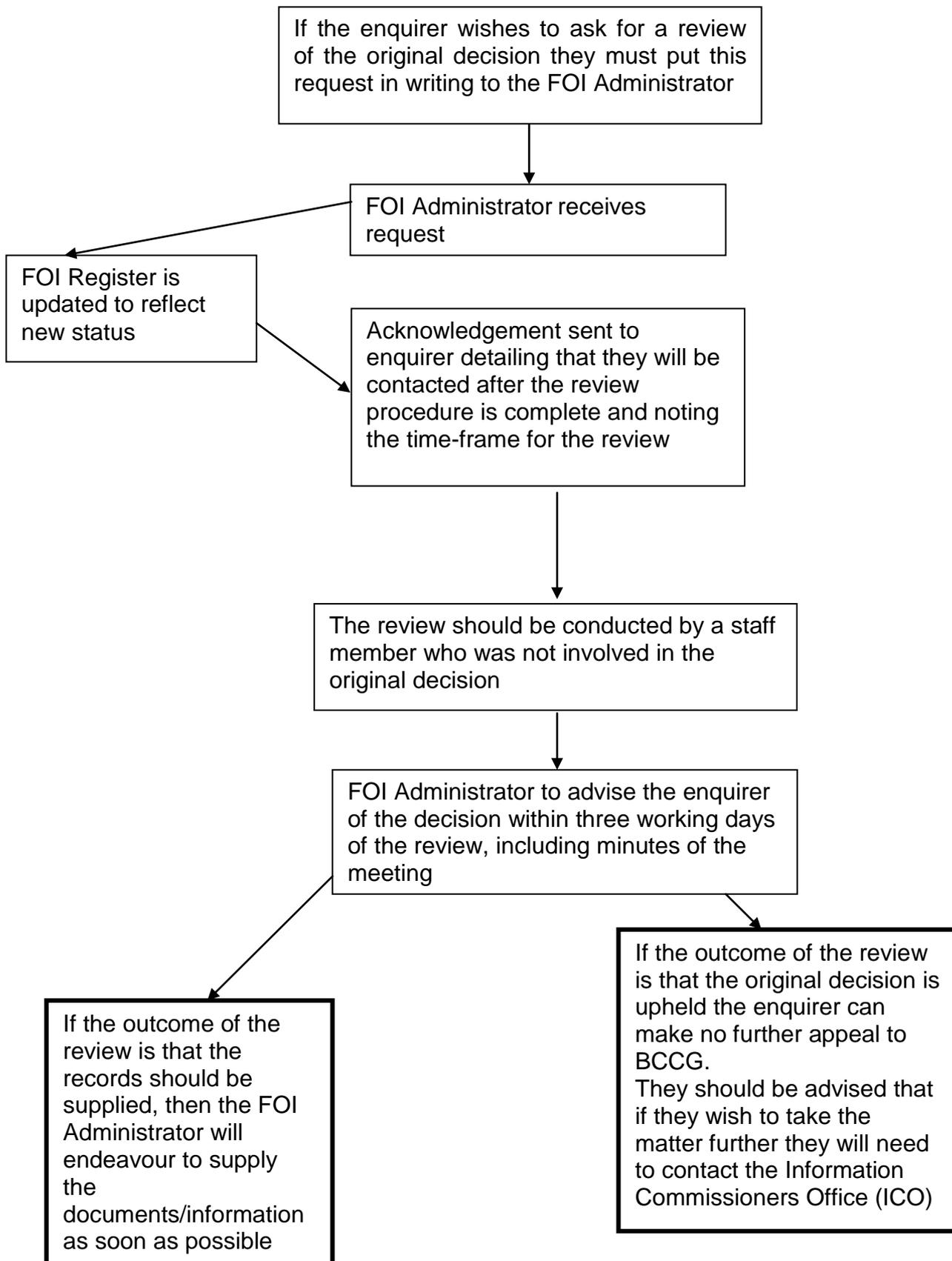
By email: [BARNCCG.FOI@nhs.net](mailto:BARNCCG.FOI@nhs.net)

If a written request comes in that you think may be an FOI query (even if it doesn't specify FOI) then please let the FOI team know as soon as possible on [BARNCCG.FOI@nhs.net](mailto:BARNCCG.FOI@nhs.net) as the Act specifies that we must acknowledge the request within **2 working days** of receiving it.

**FOI Process**



Review Process



**The Exemptions**

**Absolute Exemptions**

s.21	Information reasonably accessible by other means.
s.23	Information supplied by, or relating to, bodies dealing with security matters.
s.32	Court Records
s.34	Parliamentary Privilege
s.36	Prejudice to the effective conduct of public affairs (only absolute in relation to information held by the Commons of House of Lords).
s.40	Personal Information
s.41	Information provided in confidence (but only if this would constitute an actionable breach of confidence)
s.44	Information whose disclosure is prohibited by law

**Qualified Exemptions**

s.22	Information intended for future publications
s.24	National security
s.26	Defence
s.27	International relations
s.28	Relations within the UK
s.29	The Economy
s.30	Investigations and proceedings conducted by public authorities
s.31	Law enforcement
s.33	Audit functions
s.35	Formulation of government policy
s.36	Prejudice to the effective conduct of public affairs
s.37	Communications with Her Majesty etc. and honors
s.38	Health and Safety
s.39	Environmental information
s.42	Legal professional privilege
s.43	Commercial interests

**In addition to the above there are also provisions to refuse disclosure under two further sections of the Act**

s.12	Where the cost of compliance is excessive – Cross Reference 16.2
s.14	Vexatious requests

- 
1. In the main. Some personal information is a qualified exemption.
  2. Whether there is an actionable breach of confidence involves looking at similar considerations to those of the public interest test.

## **Relevant Legislation**

## **Appendix 5**

Freedom of Information Act 2000

Environmental information Regulations

Data Protection Act 1998

## Barnsley CCG - FoI Contacts

Name of contact	Subject area
Head of Communications & Engagement	<p>Communications and Engagement including</p> <p>Children's surgery Review &amp; Stroke services Review</p> <p>Comms &amp; Engagement for the South Yorkshire and Bassetlaw Sustainability &amp; Transformation Plan</p> <p>Any media enquiries (e.g Barnsley Chronicle)</p>
Head of Planning Delivery & Performance	Performance, progress against targets
Commissioning & Transformation Support Officer	Commissioning and Transformation Team
Head of Medicines Optimisation	Prescribing/ Medicines Management/ Formulary
Contracting Support Officer	Finance and Contracting
Governance & Assurance Manager	Corporate Governance, organisational / committee Structures, staff information,
Medical Director	Medical Director queries
Deputy Chief Nurse	Quality / CQUINS
Head of Strategy & Organisational Development	Sustainable Transformation Plan, Accountable Care Organisation
Receptionist / Service Delivery Manager eMBED / Contracting Support Officer	<p>IT (if IT hardware e.g number of computers or phones refer to the Receptionist</p> <p>For software information refer Service Delivery Manager eMBED</p> <p>For contract information e.g length or cost direct to Contracting Support Officer)</p>
Customer Intelligence Manager	Business Intelligence (activity data)
Continuing Healthcare Operation Lead	Continuing Healthcare

HR Manager	Human Resources
Head of Joint Commissioning	For any services that are jointly commissioned between the CCG and Local Authority eg Mental Health Services
Head of Individual Funding Requests Sheffield CCG	Individual Funding Requests

Appendix 7

## Equality Impact Assessment

<b>Title of policy or service:</b>	Freedom of Information Policy	
<b>Name and role of officer/s completing the assessment:</b>	Kay Morgan & Richard Walker	
<b>Date of assessment:</b>	10 February 2017	
<b>Type of EIA completed:</b>	Initial EIA 'Screening' <input checked="" type="checkbox"/> or 'Full' EIA process <input type="checkbox"/>	<i>(select one option - see page 4 for guidance)</i>

1. Outline	
<p><b>Give a brief summary of your policy or service</b></p> <ul style="list-style-type: none"> <li>• Aims</li> <li>• Objectives</li> <li>• Links to other policies, including partners, national or regional</li> </ul>	<p>Policy implemented to provide a process and framework to manage Freedom Of Information requests received by Barnsley CCG. The aim of the policy is to comply with statutory requirements, legislation and best practice.</p>

### Identifying impact:

- **Positive Impact:** will actively promote or improve equality of opportunity;
- **Neutral Impact:** where there are no notable consequences for any group;
- **Negative Impact:** negative or adverse impact causes disadvantage or exclusion. If such an impact is identified, the EIA should ensure, that as far as possible, it is either justified, 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Carers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Religion or belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pregnancy and maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Marriage and civil partnership (only eliminating discrimination)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Other relevant groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
HR Policies only: Part or Fixed term staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

**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 onto the action plan below.

<b>3. Action plan</b>				
<b>Issues/impact identified</b>	<b>Actions required</b>	<b>How will you measure impact/progress</b>	<b>Timescale</b>	<b>Officer responsible</b>
<p>No anticipated detrimental impact has been identified on any equality group.</p> <p>The policy is applicable to all employees and adheres to the Freedom of Information Act, statutory requirements and best practice and makes all reasonable provision to ensure equity of access to all.</p>	<p>There are no statements, conditions or requirements that disadvantage any particular group of people with a protected characteristic – therefore there is no required action identified.</p>	.		Richard Walker

<b>4. Monitoring, Review and Publication</b>				
<b>When will the proposal be reviewed and by whom?</b>	<b>Lead / Reviewing Officer:</b>	Richard Walker	<b>Date of next Review:</b>	February 2019

Once completed, this form **must** be emailed to, Equality Manager for sign off:

<b>Equality Manager signature:</b>	
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