

Equality & Health Impact Assessment for PROFESSIONAL REGISTRATION PROCEDURE

Please read the Guidance Notes in Appendix 1 prior to commencing this Assessment

Please note:

- The completed Equality & Health Impact Assessment (EHIA) must be
 - Included as an appendix with the cover report when the strategy, policy, plan, procedure and/or service change is submitted for approval
 - Published on the UHB intranet and internet pages as part of the consultation (if applicable) and once agreed.
- Formal consultation must be undertaken, as required¹
- Appendices 1-3 must be deleted prior to submission for approval

Please answer all questions:-

1.	For service change, provide the title of the Project Outline Document or Business Case and Reference Number	
2.	Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details	Rachel Pressley, Workforce Governance Manager, 47559
3.	Objectives of strategy/ policy/ plan/ procedure/ service	<ul style="list-style-type: none"> • To protect the public, making sure that those who practice a health profession are doing so safely • To set out the UHB's requirements for professional registered staff • To provide guidance to managers on the processes for checking and recording professional registration at the recruitment stage • To ensure all staff (permanent, temporary, fixed term and honorary) maintain their registration

¹http://www.cardiffandvale.wales.nhs.uk/portal/page?_pageid=253.73860407.253_73860411&_dad=portal&_schema=PORTAL

		<ul style="list-style-type: none"> To provide information on actions to be taken if registration lapses
<p>4.</p>	<p>Evidence and background information considered. For example</p> <ul style="list-style-type: none"> population data staff and service users data, as applicable needs assessment engagement and involvement findings research good practice guidelines participant knowledge list of stakeholders and how stakeholders have engaged in the development stages comments from those involved in the designing and development stages <p>Population pyramids are available from Public Health Wales Observatory² and the UHB's 'Shaping Our Future Wellbeing' Strategy provides an overview of health need³.</p>	<ul style="list-style-type: none"> Workforce monitoring data (see end of document) A consultation has taken place between <<insert dates>> via the UHB intranet site. A number of EQIAs from other organisations were accessed via a Google search on 20 June 2018 - of those accessed: <ul style="list-style-type: none"> Velindre NHS Trust found that their Professional Registration Policy had no impact to the equality groups mentioned. Southern Health NHS Foundation Trust noted that their Validation of Professional Registration Policy and Procedure had a a positive impact on the basis that professional staff are responsible for keeping their registration up -to -date during their period of employment with the Trust, including during any periods of sickness absence, maternity/adoption leave or employment breaks. Royal Cornwall Hospitals NHS Trust found that there were no concerns that their Professional Registration Policy could have differential impact on any of the protected characteristics groups Rotherham Doncaster and South Humber NHS Foundation Trust found that their Policy for the Verification of Employees Professional Registration had a neutral impact on all of the protected characteristics on the basis that it is consistent in its approach to the management of professional registration regardless of age. South Staffordshire and Shropshire Healthcare NHS Foundation Trust considered each of the protected characteristics with regards to their Registration Authority Management Policy and found that it: <ul style="list-style-type: none"> would not have an impact on national or local people/staff there were no particular groups or communities likely to have different needs, experiences and/or attitudes in relation to the policy proposal there were no policy that could contribute to inequality the aims of the policy were not in conflict with the Equality Duty requirements <p>According to the NHS Employers Professional Registration and Qualification Check Standard , professional regulation is intended to protect the public, ensuring that those who practice in a particular profession are committed to providing</p>

² <http://nww2.nphs.wales.nhs.uk:8080/PubHObservatoryProjDocs.nsf>

³ <http://www.cardiffandvaleuhb.wales.nhs.uk/the-challenges-we-face>

high standards of care. There are currently 8 regulatory bodies in health, with more than one million health professionals on their registers. Their main functions include:

- establishing standards of competence, ethics and conduct
- establishing standards for training
- keeping a register of those who meet the standards
- dealing with registrants who fall short.

Professional registration does not guarantee that an individual is suitable for a particular role and a range of checks should be undertaken by employers. Registration with a regulatory or licensing body does, however, assume that appropriate documentary evidence has already been provided and validated in order for them to register in the first place. The Standard states that where relevant to the position being recruited to, it should be made a contractual condition for the healthcare professional to maintain their registration with the relevant professional regulatory body throughout their employment. In the event that an individual's registration is suspended, the employer should treat this as an exclusion from the work for which the registration is required and manage it accordingly

The conditions of employment set out in the NHS Wales Contract of Employment include the following:

- If you undertake work which requires professional/state registration you are responsible for ensuring that you are so registered. Failure to maintain registration, or loss of registration, will be treated as a breach of your terms and conditions of employment and may result in disciplinary action.
- Your employment, and continued employment, is conditional upon having and retaining all the relevant educational, vocational, professional and any other relevant qualifications that you have stated you had when you completed your application form.

The [Nursing and Midwifery Council \(NMC\) produces an Annual Equality Report](#) which shows progress against its strategic equality and diversity aims, and provides data about the diversity demographics of:

- it's people, including Council members, staff employed by the NMC, FtP (Fitness to Practice) panel members and legal assessors
- nurses and midwives on the register
- the diversity of nurses and midwives that go through fitness to practice processes.

The BMA carries out equality and inclusion monitoring. The [BMA Equality Lens](#) is a data resource that brings together figures on gender and ethnicity from across the doctor workforce in all UK countries, updated annually. Key trends identified include:

1. The proportion of licensed women doctors has risen further in the past year, especially in general practice and obstetrics and gynaecology where women were already well-represented. In areas like surgery, emergency medicine and anaesthesia there has been very little or no change.

		<p>2. The trend of growing numbers of BME doctors in the profession continues. However, inequalities in how they are treated within the profession and medical education and training persist</p> <p>3. Medical academia is less diverse than other areas of the profession and there are significant differences between the make-up of the current medical student population and medical academics. (n.b. the BMA is not a regulatory body, but the equality data provided is still interesting and relevant)</p> <p>In Wales, the HCPC (Health and Care Professions Council) has 13,570 registrants, of which 9,923 are female and 3,644 are male.</p>
5.	Who will be affected by the strategy/ policy/ plan/ procedure/ service	<p>The groups of individuals who will benefit from this procedure include:</p> <ul style="list-style-type: none"> • Our patients and their families • Managers • Our staff • Workforce and OD • The public

6. EQIA / How will the strategy, policy, plan, procedure and/or service impact on people?

Questions in this section relate to the impact on people on the basis of their 'protected characteristics'. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
<p>6.1 Age For most purposes, the main categories are:</p> <ul style="list-style-type: none"> • under 18; • between 18 and 65; and • over 65 	<p>There may be occasions where newly qualified professional staff commence employment prior to receipt of confirmation of registration. In such circumstances the individual will initially be employed and may work supervised at the pay scale for the relevant level for a Health Care Support Worker in that area until their registration is confirmed. It is anticipated that this will largely apply to younger employees graduating from university.</p>		
<p>6.2 Persons with a disability as defined in the Equality Act 2010 Those with physical impairments, learning disability, sensory loss or impairment, mental health</p>	<p>This procedure has a positive impact on this group by ensuring that the same processes are followed irrespective of whether or not an individual has a disability.</p>	<p>Managers/HR can provide support to individuals unable to understand/access the forms. Trade Union members can also seek support from their TU.</p>	

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
conditions, long-term medical conditions such as diabetes	<p>Accessibility may be an issue for some groups e.g. individuals with sensory loss, learning disabilities or dyslexia</p> <p>The procedure states that employees are responsible for ensuring they maintain their registration and meet the requirements of CPD for their profession including when they are absent from work due to sickness.</p>	Large print versions etc. can be provided on request	
<p>6.3 People of different genders: Consider men, women, people undergoing gender reassignment</p> <p>NB Gender-reassignment is anyone who proposes to, starts, is going through or who has completed a process to change his or her gender with or without going through any medical procedures. Sometimes referred to as Trans or Transgender</p>	<p>This procedure has a positive impact on this group by ensuring that the same processes are followed irrespective of the gender of the individual concerned.</p>		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
6.4 People who are married or who have a civil partner.	This procedure has a positive impact on this group by ensuring that the same processes are followed irrespective of the marital status of the individual concerned.		
6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding. They are protected for 26 weeks after having a baby whether or not they are on maternity leave.	The procedure states that employees are responsible for ensuring they maintain their registration and meet the requirements of CPD for their profession including when they are on maternity leave. The procedure references the Maternity Leave Procedure for guidance on 'Keeping in Touch' (KIT) days.		
6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers	This procedure has a positive impact on this group by ensuring that the same processes are followed irrespective of the race of the individual concerned.		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
<p>6.7 People with a religion or belief or with no religion or belief. The term 'religion' includes a religious or philosophical belief</p>	<p>This procedure has a positive impact on this group stating that due consideration should be given to cultural/religious practices which may impact on the timings of breaks</p>		
<p>6.8 People who are attracted to other people of:</p> <ul style="list-style-type: none"> • the opposite sex (heterosexual); • the same sex (lesbian or gay); • both sexes (bisexual) 	<p>This procedure has a positive impact on this group by ensuring that the same processes are followed irrespective of who the individual concerned is attracted to.</p>		
<p>6.9 People who communicate using the Welsh language in terms of correspondence, information leaflets, or service plans and design</p> <p>Well-being Goal – A Wales of vibrant culture and thriving Welsh language</p>	<p>There is no evidence to suggest that this procedure has any impact on people because of their Welsh Language Skills.</p>		
<p>6.10 People according to their income related group: Consider people on low income, economically inactive,</p>	<p>There is no evidence to suggest that this procedure has any impact on people because of their income group</p>		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
unemployed/workless, people who are unable to work due to ill-health			
6.11 People according to where they live: Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities	There is no evidence to suggest that this procedure has any impact on the basis of where our employees live		
6.12 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service	Employees are responsible for notifying their manager immediately of any material facts inside or outside work which may impact on his/her registration, such as being arrested or receiving a policy caution		

HIA / How will the strategy, policy, plan, procedure and/or service impact on the health and well-being of our population and help address inequalities in health?

Questions in this section relate to the impact on the overall health of individual people and on the impact on our population. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
<p>7.1 People being able to access the service offered: Consider access for those living in areas of deprivation and/or those experiencing health inequalities</p> <p>Well-being Goal - A more equal Wales</p>	<p>There is no evidence to suggest that this procedure has any impact on the basis of access to services as they apply to all staff</p>		
<p>7.2 People being able to improve /maintain healthy lifestyles: Consider the impact on healthy lifestyles, including healthy eating, being active, no smoking /smoking cessation, reducing the harm caused by alcohol and /or non-prescribed drugs plus access to services that support disease prevention (eg immunisation and vaccination, falls prevention). Also consider impact on access to</p>	<p>There is no evidence to suggest that this procedure has any impact on the basis of being able to improve/maintain healthy lifestyles as they apply to all staff</p>		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
<p>supportive services including smoking cessation services, weight management services etc</p> <p>Well-being Goal – A healthier Wales</p>			
<p>7.3 People in terms of their income and employment status: Consider the impact on the availability and accessibility of work, paid/ unpaid employment, wage levels, job security, working conditions</p> <p>Well-being Goal – A prosperous Wales</p>	<p>Employees need to understand that if they are removed from the register by their own Professional body they will no longer be able to be legally employed by the UHB</p> <p>Employees whose evidence of statutory registration cannot be verified will not be allowed to commence their duties and their offer of employment will be withdrawn.</p>		
<p>7.4 People in terms of their use of the physical environment: Consider the impact on the availability and accessibility of transport, healthy food, leisure activities, green spaces; of the design of the built environment on</p>	<p>There is no evidence to suggest that this procedure has any impact on the basis of on the people using their physical environment</p>		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
<p>the physical and mental health of patients, staff and visitors; on air quality, exposure to pollutants; safety of neighbourhoods, exposure to crime; road safety and preventing injuries/accidents; quality and safety of play areas and open spaces</p> <p>Well-being Goal – A resilient Wales</p>			
<p>7.5 People in terms of social and community influences on their health: Consider the impact on family organisation and roles; social support and social networks; neighbourliness and sense of belonging; social isolation; peer pressure; community identity; cultural and spiritual ethos</p> <p>Well-being Goal – A Wales of cohesive communities</p>	<p>There is no evidence to suggest that this procedure has any impact on the basis of social and community influences on their health</p>		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
<p>7.6 People in terms of macro-economic, environmental and sustainability factors: Consider the impact of government policies; gross domestic product; economic development; biological diversity; climate</p> <p>Well-being Goal – A globally responsible Wales</p>	<p>There is no evidence to suggest that this procedure has any impact on the basis of macro-economic, environmental and sustainability factors</p>		

Please answer question 8.1 following the completion of the EHIA and complete the action plan

<p>8.1 Please summarise the potential positive and/or negative impacts of the strategy, policy, plan or service</p>	<p>This Procedure has a positive impact on all groups with protected characteristics as set out in the Equality Act (2010) by ensuring that the same opportunities, entitlements and obligations exist and processes are followed for all staff. Any exceptions to this are set out in legislation and are for the benefit of one or more groups with protected characteristics:</p> <p>AGE: newly qualified professional staff may on occasions commence employment prior to receipt of confirmation of registration and would initially be employed (and work supervised) at the pay scale for the relevant level for a Health Care Support Worker in that area until their registration is confirmed. It is anticipated that this will largely apply to younger employees graduating from university.</p> <p>DISABILITY: Accessibility may be an issue for some groups e.g. individuals with sensory loss, learning disabilities or dyslexia. The procedure states that employees are responsible for ensuring they maintain their registration and meet the requirements of CPD for their profession including when they are absent from work due to sickness.</p> <p>MATERNITY: employees are responsible for ensuring they maintain their registration and meet the requirements of CPD for their profession including when they are on maternity leave. The procedure references the Maternity Leave Procedure for guidance on 'Keeping in Touch' (KIT) days.</p> <p>INCOME/EMPLOYMENT STATUS: Employees need to understand that if they are removed from the register by their own Professional body they will no longer be able to be legally employed by the UHB. Employees whose evidence of statutory registration cannot be verified will not be allowed to commence their duties and their offer of employment will be withdrawn.</p>
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	OTHER GROUPS/RISK FACTORS: Employees are responsible for notifying their manager immediately of any material facts inside or outside work which may impact on his/her registration, such as being arrested or receiving a policy caution
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Action Plan for Mitigation / Improvement and Implementation

	Action	Lead	Timescale	Action taken by Clinical Board / Corporate Directorate
8.2 What are the key actions identified as a result of completing the EHIA?	No changes required to the Procedure – EPSG to be asked to roll it forward for a further 3 years	WF Gov Manager	July 2018	
8.3 Is a more comprehensive Equalities Impact Assessment or Health Impact Assessment required? This means thinking about relevance and proportionality to the Equality Act and asking: is the impact significant enough that a more formal and full consultation is required?	No, as the overall impact is positive.			

	Action	Lead	Timescale	Action taken by Clinical Board / Corporate Directorate
<p>8.4 What are the next steps?</p> <p>Some suggestions:-</p> <ul style="list-style-type: none"> • Decide whether the strategy, policy, plan, procedure and/or service proposal: <ul style="list-style-type: none"> ○ continues unchanged as there are no significant negative impacts ○ adjusts to account for the negative impacts ○ continues despite potential for adverse impact or missed opportunities to advance equality (set out the justifications for doing so) ○ stops. • Have your strategy, policy, plan, procedure and/or service proposal approved • Publish your report of this impact assessment • Monitor and review 	<p>No changes are required to this Procedure as a result of this EHIA – EPSG to be asked to roll it forward for a further 3 years, after which time it will be reviewed in line with the Employment Policy Schedule</p> <p>This EHIA will be published on the UHB internet and intranet sites.</p> <p>This EHIA will be reviewed three years after approval unless changes to terms and conditions, legislation or best practice determine that an earlier review is required</p>	<p>WF Gov Manager</p>	<p>Ongoing</p> <p>On approval</p> <p>2021</p>	

WORKFORCE PROFILE (March 2018):



