

**EQUALITY IMPACT ANALYSIS**  
**Policy and Guidance for Joint Working and Commercial Sponsorship**  
**with the Pharmaceutical Industry**  
**HaRD 018**

<b>Date of Analysis:</b>	December 2013
<b>This Equality Impact Analysis was completed by: (Name and Department)</b>	Marlene Wharton CSU Corporate Strategy & Policy Manager
<b>What are the aims and intended effects of this policy, project or function?</b>	Assist NHS Harrogate & Rural District CCG achieve its objectives and delivery of national and local priorities by building effective and appropriate working relationships with potential sponsors.  Inform and advise staff of their main responsibilities when entering into joint working arrangements and commercial sponsorship with companies including the pharmaceutical industry.
<b>Please list any other policies that are related to or referred to as part of this analysis</b>	Conflicts of Interest Policy Business Conduct Policy
<b>Who does the policy, project or function affect?</b>  Please Tick ✓	Employees <input checked="" type="checkbox"/> Service Users <input type="checkbox"/> Members of the Public <input type="checkbox"/>  Other (List Below) <input checked="" type="checkbox"/> CCG Members Governing Body Council of Members Committee and sub-committee Members Individuals contracted to work on behalf of or provide services or facilities to, the CCG

## Equality Impact Analysis: Screening

	Could this policy have a positive impact on...		Could this policy have a negative impact on...		Is there any evidence which already exists from previous (e.g. from previous engagement) to evidence this impact
	Yes	No	Yes	No	
<b>Race</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Age</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Sexual Orientation</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Disabled People</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Gender</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Transgender People</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Pregnancy and Maternity</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Marital Status</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	
<b>Religion and Belief</b>	<input type="checkbox"/>	✓	<input type="checkbox"/>	✓	

<b>Reasoning</b>	This policy will have neither a positive nor negative impact on the protected characteristics as it relates to the principles which should be adhered to when entering into any joint working or sponsorship arrangements with the pharmaceutical industry (or any other private companies) and are applicable to everyone outlined within the scope of the policy.
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**If there is no positive or negative impact on any of the Nine Protected Characteristics go to Section 7**

## Equality Impact Analysis Findings

Analysis Rating:	<input type="checkbox"/> Red	<input type="checkbox"/> Red/Amber	<input type="checkbox"/> Amber	<input checked="" type="checkbox"/> Green
		Actions	Wording for Policy / Project / Function	
<b>Red</b> <b>Stop and remove the policy</b>	<b>Red:</b> As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	<p><b>Remove the policy</b></p> <p>Complete the action plan above to identify the areas of discrimination and the work or actions which needs to be carried out to minimise the risk of discrimination.</p>	No wording needed as policy is being removed	
<b>Red Amber</b> <b>Continue the policy</b>	As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy and further professional advice should be taken.	<p><b>The policy can be published with the EIA</b></p> <p>List the justification of the discrimination and source the evidence (i.e. clinical need as advised by NICE).</p> <p>Consider if there are any potential actions which would reduce the risk of discrimination.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. However, a genuine determining reason exists which justifies the use of this policy and further professional advice.</p> <p><b><i>[Insert what the discrimination is and the justification of the discrimination plus any actions which could help what reduce the risk]</i></b></p>	

<p><b>Amber</b></p> <p><b>Adjust the Policy</b></p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p><b>The policy can be published with the EIA</b></p> <p>The policy can still be published but the Action Plan must be monitored to ensure that work is being carried out to remove or reduce the discrimination.</p> <p>Any changes identified and made to the service/policy/ strategy etc. should be included in the policy.</p> <p>Another EIA must be completed if the policy is changed, reviewed or if further discrimination is identified at a later date.</p>	<p>As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p> <p><b><i>[Insert what the discrimination is and what work will be carried out to reduce/eliminate the risk]</i></b></p>
<p><b>Green</b></p> <p><b>No major change</b></p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>The policy can be published with the EIA</b></p> <p>Another EIA must be completed if the policy is changed, reviewed or if any discrimination is identified at a later date</p>	<p>As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>

<b>Brief Summary/Further comments</b>	Not applicable – see results of the assessment.	
<b>Approved By</b>		
Job Title:	Name:	Date:
Chief Officer	Amanda Bloor	December 2013