

Oxfordshire CCG Equality Analysis Template	
<b>Policy / Project / Function:</b>	Personal Wheelchair Budgets (PWB)
<b>PMO Reference Number</b>	
<b>Completed by:</b>	Paul Kettle
<b>Date of Analysis:</b>	23/8/17
<b>Equality Analysis signed off by:</b>	Maggie Dent <span style="float: right;"><b>Date</b> 26.2.2018</span>
<b>Analysis Rating:</b> please highlight  See Completion Notes at the end of this document	<ul style="list-style-type: none"> <li><input type="radio"/> Red</li> <li><input type="radio"/> Red/Amber</li> <li><input checked="" type="radio"/> Amber</li> <li><input type="radio"/> Green</li> </ul>
<b>Type of Analysis Performed:</b>  Please Tick ✓ or Highlight	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> Business Case</li> <li><input type="radio"/> Service re-design</li> <li><input type="radio"/> Policy Analysis</li> <li><input type="radio"/> Consultation</li> <li><input type="radio"/> Meeting</li> <li><input type="radio"/> Other</li> </ul> <p>Please note that if you need to re-write or adjust your original document (e.g. a Business Case), your initial Equality Analysis may also need to be updated.</p>
Please list any other policies that are related to or referred to as part of this analysis	
<b>Who does the policy, project or function affect?</b>  Please Tick ✓ or Highlight	<ul style="list-style-type: none"> <li><input checked="" type="radio"/> Employees</li> <li><input checked="" type="radio"/> Service Users</li> <li><input type="radio"/> Applicants</li> <li><input checked="" type="radio"/> Members of the Public</li> <li><input type="radio"/> Other (List Below)</li> </ul>

<b>Equality Analysis</b>																	
<b>What are the aims and intended effects of this policy, project or function?</b>	<p>NHSE require all CCGs to develop a plan by 31/3/18 to replace wheelchair vouchers with personal wheelchair budgets (PWB).</p> <p>The primary aims of the PWBs are to:</p> <ul style="list-style-type: none"> <li>• increase choice and control for people who access wheelchair services</li> <li>• offer holistic assessments and support people to identify their own preferred health and wellbeing outcomes through well documented care and support plans</li> <li>• facilitate joint funding and integrate services around individuals' preferred outcomes (e.g. joint assessments and solutions)</li> <li>• make options and costs transparent to increase the availability of information about the equipment and funding choices available to people locally</li> <li>• meet principles of personal health budgets</li> </ul>																
<b>Is any Equality Data available relating to the use or implementation of this policy, project or function?</b>	<p>This project will impact all current and new users of the Oxfordshire Wheelchair Service at the point of assessment and provision of equipment.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 25%;">2017</th> <th style="width: 25%;">Adults</th> <th style="width: 25%;">Children</th> <th style="width: 25%;">Total</th> </tr> </thead> <tbody> <tr> <td>Registered service users 12/2017</td> <td>8397</td> <td>700</td> <td>9097</td> </tr> <tr> <td>Assessments</td> <td>1386</td> <td>225</td> <td>1611</td> </tr> <tr> <td>Episodes of care closed <sup>1</sup></td> <td>1221</td> <td>122</td> <td>1343</td> </tr> </tbody> </table>	2017	Adults	Children	Total	Registered service users 12/2017	8397	700	9097	Assessments	1386	225	1611	Episodes of care closed <sup>1</sup>	1221	122	1343
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<b>List any Consultation e.g. with employees, service users, Unions or members of the public that has taken place in the development or implementation of this policy, project or function</b>	<p>Impact on members of staff in the Oxfordshire Wheelchair Service (OWS) will be limited to following a new assessment process to include care &amp; support planning. This process is very closely aligned with current best practice amongst the team so should have minimal impact. A representative of the affected group is leading the development of processes and the</p>																

<sup>1</sup> Episodes of care are closed at the point of equipment being issued or the decision that equipment is not required on the grounds of eligibility, need or service user preference.

design of supporting documentation. OWS will provide training for their staff. There will be no change to terms of employment stemming from this project.

The project will introduce service changes to reflect best practice from CCGs where PWBs have already been introduced (specifically Gloucestershire), which have been informed by client feedback. These changes will impact on existing clients and members of the public (prospective new clients) in that they will receive more, clearer information and be given more choice.

Meetings with OWS staff representative(s):

25/4/17 PWB Workshop & presentation by NHSE

1/6/17 PWB discussion, PK, JE, NH & DC

8/6/17 Process discussion PK & NH

19/7/17 Posture & Mobility Group (PMG) conference – plenary session on PWBs PK & NH

29/8/17 PWB Working Group Meeting

Engagement with service users

Feedback will be requested from new and existing service users and their carers regarding:

- the information gathering process
- associated communication
- opportunity for service users to influence outcomes
- service user's choices and support for this process

Equality Analysis Test:				
What impact will the implementation of this policy, project or function have on employees, service users or other people who share characteristics protected by <i>The Equality Act 2010</i> ?				
Protected Characteristic:	Neutral Impact:	Positive Impact:	Negative Impact (Potential adverse impact) :	Evidence of impact and if applicable, justification where a <i>Genuine Determining Reason</i> exists
<b>Gender</b> (Men and Women)	X			
<b>Race</b> (All Racial Groups)			X	<p>Those service users whose first language is not English, could be disadvantaged by the additional level of communication to gather information and to provide information about available options.</p> <p>Existing translation and interpreting services used and offered by the wheelchair service will be used to support all aspects of communication associated with the enhanced process. Specifically this will include initial contact with the (potential) service user, the pre-assessment questionnaire, the assessment and the care and support plan.</p>

<b>Disability</b> (Mental, Physical, Learning Disability and sensory disability)		X	X	<p>Wheelchair users will have greater opportunity to influence the development of their care &amp; support plans; they will also have clearer information about the choices available to them and the value &amp; impact of those choices.</p> <p>The current practice of offering translation support and carer involvement will continue to enable service users to be as well informed and involved in the decision making regarding their service provision and care as possible.</p> <p>However, consideration needs to be given to people who may have learning difficulties or sensory impairment alongside their physical disability, i.e. providers to consider the need for Easy Read or Braille/ audio for their care plans. Deaf interpreting may be required for hearing impaired patients.</p>
<b>Religion or Belief</b>	X			
<b>Sexual Orientation</b> (Heterosexual, Homosexual and Bisexual)	X			
<b>Pregnancy and Maternity</b>	X			The planned service changes will not impact on

				current provision, which include equipment reviews when needs change.
<b>Marital Status</b> (Married and Civil Partnerships)	X			
<b>Gender re-assignment</b> A person proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex. A reference to a transsexual person is a person who has the protected characteristic of gender identity.	X			
<b>Age</b> (People of all ages)	X			The service will continue to be for infants, children and adults of all ages. The provision of service includes buggies for infants. No change is intended to this aspect of the service.

<p><b>Other groups nominated by OCCG</b> which could experience inequality of access or treatment, such as carers, veterans, homeless people and people living in socio-economic areas of deprivation in Oxfordshire.</p>			<p>X</p>	<p>No change is expected in the current referral process for all potential service users who may be referred by a GP or other health or social care professional.</p> <p>Communication with any homeless service users will need to be addressed with care and flexibility to ensure they receive and are able to respond to communication, particularly the pre-assessment questionnaire.</p>
<p><b>Sustainability:</b></p> <ul style="list-style-type: none"> <li>• Economic, Social and Environmental considerations in the design, procurement and commissioning of services for the people of Oxfordshire.</li> <li>• Delivery of an affordable healthcare service for improving population wellbeing and reducing health inequalities.</li> <li>• Have sustainable models of health care been considered?</li> </ul>	<p>X</p>			<p>The new assessment process and associated Care &amp; Support plan should improve outcomes to take better account of service users' desired outcomes. The process, outcomes and methods of communication will be reviewed after three and six months by:</p> <ul style="list-style-type: none"> <li>• Collecting comments from service users and their carers</li> <li>• Collecting feedback from OWS staff members</li> <li>• Reviewing quarterly performance data</li> <li>• Reviewing the additional communication cost</li> <li>• Reviewing impact on duration of assessments</li> </ul>

Action Planning:				
As a result of performing this analysis, what actions are proposed to remove or reduce any risks of adverse outcomes identified on employees, service users or other people who share characteristics protected by <i>The Equality Act 2010</i> ?				
Identified Risk:	Recommended Actions:	Responsible Lead:	Completion Date:	Review Date:
<p><b>Race</b></p> <p>A service user whose first language is not English could be disadvantaged by the additional level of communication to gather information and to provide information about available options.</p>	<p>Existing translation and interpreting services used and offered by the wheelchair service will be used to support all aspects of communication associated with the enhanced process. Specifically this will include initial contact with the (potential) service user, the pre-assessment questionnaire, the assessment and the care and support plan.</p>	<p>Jan Edwards, OWS, OUH</p>	<p>Already in place 23/2/18</p>	<p>31/3/19</p>
<p><b>Disability</b></p> <p>Consideration needs to be given to service users with learning difficulties or sensory impairment</p>	<p>Providers to consider the need for Easy Read or Braille/ audio for their care plans. Deaf interpreting may be required for hearing impaired patients.</p> <p>The current practice of offering translation and</p>	<p>Jan Edwards, OWS, OUH</p>	<p>Already in place 23/2/18</p>	<p>31/3/19</p>

<p>alongside their physical disability.</p>	<p>interpretation support and carer involvement will continue to enable service users to be as well informed as possible and involved in the decision making regarding their service provision and care.</p>			
<p><b>Other groups nominated by OCCG</b></p> <p>Homeless service users could be disadvantaged if methods of communication (letters, phone calls, emails) are not selected and adapted to be effective.</p>	<p>Communication with any homeless service users will need to be addressed with care and flexibility to ensure they receive, and are able to respond to, communication; the care and support plan, pre-assessment questionnaire and information regarding appointments in particular need to be considered.</p> <p>No change is expected in the current referral process for all potential service users who may be referred by a GP or other health or social care professional.</p>	<p>Jan Edwards, OWS, OUH</p>	<p>1/4/18</p>	<p>31/3/19</p>

Cut and paste this table if required.

**Completion Notes**

<p>Analysis Ratings:</p>	<p>After completing this document, rate the overall analysis as follows:</p> <ul style="list-style-type: none"> <li>• <b>Red:</b> Risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the 9 <i>Protected Characteristics groups</i>. It is recommended that the use of the activity or policy be suspended until further work or analysis is performed.</li> <li>• <b>Red Amber:</b> Risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the 9 <i>Protected Characteristics groups</i>. However, a genuine determining reason may exist that could legitimise or justify the use of this activity or policy and further professional advice should be taken.</li> <li>• <b>Amber:</b> 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.</li> <li>• <b>Green:</b> The policy or activity does not appear to have any adverse effects on 9 <i>Protected Characteristics groups</i> and no further actions are recommended at this stage.</li> </ul>
<p>Equality Data:</p>	<p>Equality data is internal or external information that may indicate how the activity or policy being analysed can affect different groups of people who share the nine <i>Protected Characteristics</i> – referred to hereafter as '<i>Equality Groups</i>'.            Examples of Equality Data include: (this list is not definitive)</p> <ol style="list-style-type: none"> <li>1. Application success rates by <i>Equality Groups</i></li> <li>2. Complaints by <i>Equality Groups</i></li> <li>3. Service usage and withdrawal of services by <i>Equality Groups</i></li> <li>4. Grievances or decisions upheld and dismissed by <i>Equality Groups</i></li> <li>5. Demographic data for <i>Equality Groups</i></li> <li>6. Health Intelligence for <i>Equality Groups</i></li> </ol>
<p>Legal Status:</p>	<p>This document is designed to assist organisations in "<i>Identifying and eliminating unlawful Discrimination, Harassment and Victimisation</i>" as required by <i>The Equality Act Public Sector Duty 2011</i>. An Equality Impact Analysis is not, in itself, legally binding and should not be used as a substitute for legal or other professional advice.</p>

<p>Genuine Determining Reason</p>	<p>Certain discrimination may be capable of being justified on the grounds that:</p> <ul style="list-style-type: none"> <li>• <i>A genuine determining reason exists</i></li> <li>• <i>The action is proportionate to the legitimate aims of the organisation</i></li> <li>• Where this is identified, it is recommended that professional and legal advice is sought prior to completing an Equality Impact Analysis.</li> </ul>
<p>Sustainability</p>	<p>Sustainable development is about balancing social, economic and environmental considerations, meeting the needs of people now and in the future.  OCCG Sustainability Strategy and Management Plan:  <a href="http://www.oxfordshireccg.nhs.uk/wp-content/uploads/2015/09/Paper-15.84-Sustainability-Strategy-and-Management-Plan.pdf">http://www.oxfordshireccg.nhs.uk/wp-content/uploads/2015/09/Paper-15.84-Sustainability-Strategy-and-Management-Plan.pdf</a></p> <p>Sustainable Health Care – sustainable models based on prevention and efficiency; and targeted so that services are appropriate for the diverse population, and are used effectively and efficiently.</p> <p>A sustainable health and care system is achieved by delivering high quality care and improved public health without exhausting natural resources or causing severe ecological damage. Sustainable Health and Care Sector – efficient use of resources e.g. energy, clinical waste, use of medication etc.</p>

**Once completed** please send a copy of the Equality Analysis and the Policy/Activity to Maggie Dent, Equality and Access Manager, Governance team (Manizah Imam), and also to Lukasz Bohdan (PMO) if it is for a Business Case.

For more information contact members of the Equality and Diversity Working Group:

1. **Delivery & Localities:** Maggie Dent, Equality and Access Manager and Chris Walkling, Senior Commissioning Manager
2. **Quality:** Cat D'Angelo, Safeguarding Support Officer
3. **Finance/PMO:** Lukasz Bohdan, Head of PMO
4. **Governance:** Manizah Imam, Governance Manager
5. **Communications team SCWCSU:** Sara Price, Senior Communications & Engagement Account Manager