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| **Document name:** | Disclosure and Barring Service (DBS) (Formerly CRB) Policy |
| **Document type:** | Policy |
| **Staff group to whom it applies:** | All staff within the Trust |
| **Distribution:** | The Whole of the Trust |
| **How to access:** | Intranet/internet |
| **Issue date:** | August 2022 |
| **Next review:** | August 2025 |
| **Approved by:** | Executive Management Team |
| **Developed by:** | HR Manager/Recruitment Consultant and Employment Policy group |
| **Director leads:** | Chief People Officer |
| **Contact for advice:** | HR Representative/Recruitment Team |

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**1. INTRODUCTION**

The Disclosure and Barring Service (DBS) was formed in December 2012 by merging the functions of the Criminal Records Bureau (CRB) and the [Independent Safeguarding Authority](http://en.wikipedia.org/wiki/Independent_Safeguarding_Authority) (ISA) under the [Protection of Freedoms Act 2012](http://en.wikipedia.org/wiki/Protection_of_Freedoms_Act_2012).

South West Yorkshire Partnership NHS Foundation Trust (The Trust) recognises the importance of DBS checks, where they are appropriate to the role, on newly appointed employees, existing staff changing roles within the Trust, volunteers, bank staff, work placements etc. as part of the pre-employment/pre-engagement process in accordance with the appropriate legislation:

The Trust aims to promote equality of opportunity for all candidates with the necessary requirements for the post and therefore welcomes applications from candidates of a diverse background. Criminal records will be taken into account for recruitment purposes only when a conviction is relevant. Having a spent or unspent conviction, caution, reprimand or final warning on a criminal record:

* Will not necessarily prevent successful candidates from taking up employment within the Trust.
* Whilst in post, will not necessarily prevent existing employees from continuing their employment with the Trust.

The suitability of an applicant or current employee, with a criminal record for employment within the Trust, will be determined by considering the nature, circumstances and background to the offences in relation to the post, see section 10 of this policy.

**2. PURPOSE**

The purpose of this policy is to:

* Ensure suitable people are employed by the Trust and preserve the reputation of the Trust and NHS.
* Preserve the safety and security of services users, carers and families and work colleagues.
* Ensure that the Trust complies with:
  + The DBS Code of practice
  + NHS Employer’s employment check standards
  + CQC and NHS Litigation requirements
  + Data Protection Act
* Ensure that the Trust applies a consistent, fair and equitable process in the application of DBS checks.

**3. DEFINITIONS**

* **DBS applicant**

A new or existing employee or volunteer applying for a DBS check.

* **ID Checker**

The person who checks the original supporting documents during a face to face meeting with the DBS applicant and forwards the copy documents to the recruitment.

* **Spent convictions –** convictions defined by the Rehabilitation of Offenders Act 1974 as being ‘spent’ after specified periods of time. Spent convictions do not need to be brought to the attention of the Trust unless the work or post is covered by the Rehabilitation of Offenders 1974 Exceptions Order.
* **Disclosure certificate –** a certificate issued by the DBS that provides criminal record information, depending upon the type of disclosure requested.
* **Standard disclosure –** These contain details of all criminal convictions including those ‘spent’, together with cautions, reprimands, warnings and bind overs. This disclosure will also contain information from records held by the Department of Health (DH) and the Department for Education and Skills (DFES) to help NHS employers assess the suitability of candidates.
* **Enhanced disclosures –** These contain information that would be in a standard disclosure together with other information held by local police forces on the Police National Computer (PNC) and judged to be relevant to the application e.g. details of impending prosecutions.
* **Update Service** - The [update service](https://www.gov.uk/dbs-update-service) is an online subscription service that allows individuals to keep their DBS certificates up to date and allows employers to check a certificate online, with the individuals consent. Certificates can be used again when individuals apply for a position in the same workforce, where the same type and level of check is required. The 3 workforces are Child, Adult and Other.

Registration for the update service lasts for one year and starts from the date the DBS certificate was issued. There’s no charge for a [volunteer](https://www.gov.uk/dbs-check-requests-guidance-for-employers#volunteer-applications) application or certificate to join the update service.

* **Rehabilitation of Offenders Act (1974)**

The Rehabilitation of Offenders Act provides for anyone who has been convicted of a criminal offence and has been sentenced to less than two-and-a-half years in prison, to be regarded as rehabilitated after a specified period of time where no further convictions have been committed. A rehabilitation period may vary from six months to 10 years from the date of conviction. During this period the conviction is regarded as ‘unspent’ (current) and an individual is required to disclose this information to any prospective employer, or their current employer if the offence takes place during their term of employment. Once this period of rehabilitation has passed, the conviction is regarded as ‘spent’ (old). In normal circumstances the convicted person does not have to reveal any ‘spent’ convictions to a prospective employer when applying for a job. However, some professions within the Health and Social Care sector are exempt from this approach by virtue of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. In the case of such excepted professions, employers are entitled to know about all previous criminal record information whether spent or unspent (including reprimands, cautions, final warnings) and to take this information into account when assessing an individual’s suitability for the post.

Representatives of the Trust must take care not to ask questions at interview or any part of the recruitment process which could potentially lead to an applicant disclosing protected convictions or cautions that won’t be disclosed through the DBS processes and cannot take any such information into account as part of the recruitment process.

**4. RESPONSIBILITIES**

* **Chief People Officer**

The Chief People Officer is the named officer responsible for ensuring the content of this policy is applied fairly and consistently across the Trust.

* **Directors or Deputy Directors**

Directors and Deputy Directors are responsible for overseeing the dissemination and implementation of this policy across their service(s) with particular reference to responsibility for DBS NHS Employment Check Standards for Recruiting Managers. They are also responsible for considering the impact this policy may have on teams and services

* **General Managers**

General Managers are responsible for providing assurance that this policy is implemented during the recruitment process for their service(s).

* **Service Managers/Line Managers**

Service Managers/Line Managers are responsible for ensuring that:

* a review of the position has taken place to identify whether the post requires a DBS check and the level of the check required.
* all new staff are recruited appropriately for their service in line with this policy.
* new applications following changes in role for DBS checks are followed up ensuring that employees complete DBS processes in a timely manner.
* **Recruitment Teams (including Bank office)**

The Trust’s Recruitment teams are responsible for ensuring that DBS checks are undertaken in accordance with the requirements of this Policy, the DBS requirements, the DBS Code of Practice and NHS Employment Check Standards. They will ensure that appropriate records are kept on the ESR database. The Recruitment Services Team are responsible for obtaining the consent of the applicant to check their status against the DBS Update Service on an ongoing basis. The Recruitment Services Team have responsibility for ensuring any adverts confirm the requirements of this Policy to any prospective employees

* **Human Resources Department**

Staff of the HR Department are responsible for providing accurate and timely advice to managers and employees to ensure the policy is appropriately applied across the Trust.

* **Employees**

Employees are responsible for complying with this policy and responding in a timely manner when they transfer to a different role, require periodic checks, or in the event they are subject to a conviction whilst in employment. If subscribed to the update service it is the employees responsibility to renew their subscription annually, print confirmation and claim the subscription fee back through travel expenses. If an employee does not cooperate with the process to obtain a DBS check then following discussion and review the employee may be suspended without pay.

If during the course of their employment they are arrested, charged, cautioned or convicted of any criminal offence then they are contractually required to notify their line manager of the circumstances as soon as possible, this includes notification of any pending court appearance, bind-overs, absolute and conditional discharges. Failure to do so will result in formal action being taken under the Trust’s Disciplinary Policy and may result in termination of employment. Employees subject to professional registration may also be required to notify their professional body.

**5. WHO WILL THE TRUST REQUEST A DBS FOR?**

* **Staff new to the Trust**

All staff newly appointed to the Trust who are employed in a role that requires a DBS Check are contractually required to obtain a DBS certificate as described in section 6 of this policy. The Trust also requires all new staff to subscribe to the DBS Update Service and provide consent for the Trust to register an interest in their DBS Statement through the DBS update service for the duration of their employment with the Trust. Newly appointed staff requiring a DBS check will not commence employment until the DBS clearance is received.

* **Existing staff**

Existing staff who have previously not been required to undertake a DBS check or where the required level of DBS check changes, who then subsequently move to a post which falls within the definitions described in section 6 of this policy, will be required to obtain a DBS certificate and subscribe to the DBS update service. This means that rather than one check every 3 years, information will be stored within ESR (Payroll system), and the DBS system will automatically check each DBS status every 60 days to ensure the status of the certificate has not changed.

* **Existing staff working with under 18s**

All staff who work with under 18s will require a DBS check as detailed in Section 6 of the policy. Staff registered with the update service are responsible for maintaining their subscription annually, see employee responsibilities Section 4.

* **Staff transferring to the Trust under TUPE regulations.**

Staff who join the Trust under TUPE regulations and are in a post which requires a DBS check will be required to undertake a new check. It is the responsibility of the Trust on transfer to have established the requirement for a Disclosure and Barring Check to be undertaken. If a DBS check is required this must be processed within 28 days of transfer into the Trust.

**6. LEVELS OF DISCLOSURE**

The service manager is responsible for identifying whether the position requires a DBS check and, should a check be required to determine which level of check is necessary for the position. Advice should be sought from the human resources team if this is required. There are three levels of Disclosure: Standard, Enhanced (excluding the barred list check) and Enhanced (including the barred list check for roles that carry out regulated activity). The Trust will ensure it acts in accordance with the appropriate legislation and NHS Employers guidance on DBS checks.

* **Standard Disclosure**

Is available for any position or licensing application listed in the Rehabilitation of Offenders Act 1974, (Exceptions) Order 1975. Standard DBS checks show details of both spent (old) and unspent (current) convictions including cautions, reprimands and warnings held on the Police National Computer.

* **Enhanced Disclosure (excluding the barred list check)**

An enhanced disclosure contains the same information as a standard disclosure but also includes any non-conviction information held by local police, where they consider it to be relevant to the post and where this is thought necessary in the interests of preventing or detecting crime.

* **Enhanced Disclosure (including the barred list check/s)**

Employers have a legislative requirement to request barring checks to be conducted for people in positions defined as ‘regulated activity’ under the Protection of Freedom's Act 2012 which amended the Safeguarding Vulnerable Groups Act 2006 on 10 September 2012.

**7. REGULATED ACTIVITY**

A ‘regulated activity’ is defined under the Safeguarding Vulnerable Groups Act (2006) as amended by the Protection of Freedoms Act (2006) as any activity involving working or volunteering with children and/or adults, which meets specific criteria. Reference should be made to Appendix 1 for further information about ‘regulated activity’. Either one or both of the barred lists can be checked depending on the responsibilities of the post.

It is illegal for an employer to knowingly employ someone in a regulated activity when the employer knows that the person is barred from that regulated activity.

It is also an offence for a barred person to work or seek to work in regulated activity within a sector from which they are barred. In the event a prospective employee appears on the Barred List guidance should be sort from the DBS.

Where it is indicated on a DBS application form that the prospective employee will be working or volunteering with adults or children within a regulated activity, an enhanced level disclosure will be required with reference to the appropriate barred list (s).

* **Barred Lists**

There are two barred lists administered by the Independent Safeguarding Authority (ISA) (the Children’s List and the Adults List). Checks against these lists apply to any regulated activity (as defined above) that involves the individual working or volunteering with children or adults. From December 2012 the lists will be administered by the Disclosure and Barring Service (DBS).

**8. PROCESS FOR SUBSCRIBING TO DBS UPDATE SERVICE**

Initially the Trust will pay for a DBS check for each individual that requires one; the update service must be applied for by the individual within 30 days of the date issued on the DBS certificate. When applying for the update service it can be set up as manual or automatic renewal, this is the responsibility of the individual to ensure that they have a current DBS update account. <https://www.gov.uk/.../dbs-update-service-applicant-guide>**.**

**Anyone who allows their subscription to the update service to lapse will be required to complete a new DBS application in order to subcribe to the update service. The costs associated with the new application will be deducted from the staff member’s pay in two installments (although this can be changed to further split installments at an individual’s request).**

**Staff members will receive reminder emails from the DBS update service that their subscription is due and it is the responsibility of the staff member to ensure the bank card attached to the account is correct. Expired bank cards or bank cards that have been reported as lost or stolen and had a replacement issued will result in a lapsed DBS if it is not updated on the** [DBS update service.](file:///C:\Users\paul.brown\AppData\Local\Microsoft\Windows\INetCache\Content.Outlook\M7AOU1MF\sign%20in%20to%20the%20Update%20Service) **Staff must also ensure they sign up to the update service using an email address that they actively use, any changes to email addresses must be updated on individual accounts to ensure they receive reminders.**

**Individuals must also be aware that upon joining the Trust or having a duplicate DBS check undertaken where they are already subscribed to the update service a certificate can be added to their existing update service account. Where this is done, the Trust will not hold details of the original subscription date and therefore the responsibility of renewal is the staff member as Trust notifications will only relate to the date of their DBS check and not the update subscription. However, notification of renewals will be sent from the Government DBS update service which staff members must act upon.**

**All staff members are supported through the DBS update service subscription by the Trust’s DBS Team with in-depth guidance and advice provided.**

**Consideration will be given to mitigating circumstances for non-renewal of the DBS subscription.**

**9. PROCESS FOR REVIEW OF DBS INFORMATION**

For new appointments to the Trust offers of employment will be conditional upon the receipt of satisfactory pre-employment checks including a DBS check where applicable to the post. If information is received from the DBS which indicates an applicant has a conviction or caution or where concern is raised regarding an applicant, then a DBS panel will be convened consisting of a senior manager and a senior human resources representative. The panel will consider the issue, relevance of the information to the employee’s position and decide if further action is required. The panel will also review whether the applicant provided all relevant information at the time of appointment. An outcome of the DBS panel may be that the conditional offer of employment is withdrawn as a satisfactory DBS check has not been received.

A DBS Panel will also be convened to consider any DBS information received when an existing member of staff moves to a new role or has an updated DBS check. Action may involve invoking the Trust Disciplinary procedure which may include termination of employment where appropriate.

Information received following an application for a voluntary position will also be considered by a DBS panel.

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| **10. DEVELOPMENT, MONITORING THE COMPLIANCE AND EFFECTIVENESS OF THIS POLICY** | |
| This policy has been developed by the HR team with input from the Employment Policy Group including service manager and Staff Side representatives.  The Chief People Officer will ensure that a process is in place to monitor the compliance and effectiveness of this policy. This will include: | |
| Consideration of any complaints as they arise in relation to the application of the policy ensuring that issues are addressed both through feedback to Appointing/ Recruiting Officers and Human Resources staff and through amendment as required to the policy.  The DBS Policy will be subject to review by the Trust’s Auditors.  **11. REFERENCES**   * Revised and enhanced identification checking guidelines   (effective from 28 May 2012) Issued by the DBS   * NHS Employers publication Criminal records and barring checks * Recruitment and Selection Policy and code of practice * [www.gov.uk](http://www.gov.uk) * SWYPFT Safeguarding Adults Policy * SWYPFT Policy and Procedures on the Protection, Safeguarding and Promoting the Welfare of Children (incorporating the Safeguarding Children Supervision Guidance and Guidance on Child Visiting). * Criminal Justice and Court Services Act (Part II) (2000) * Protection of Children Act (1999) * Police Act (Part V) (1997) * Mental Health Act (1983) * Rehabilitation of Offenders Act and Exceptions Order (1974) * Data Protection Act (1998) * Safeguarding Vulnerable Groups Act (2006) | |
| **12.** | **EQUALITY IMPACT ASSESSMENT**  See Appendix 2. |
| **13.** | **VERSION CONTROL**  See Version Control Document at Appendix 4. |
| **14.** | **POLICY DISSEMINATION**  This policy will be placed on the Trust’s website and intranet. Managers will be made aware of the launch of the policy and training in the policy and associated procedure will be made available upon request. |

**APPENDIX 1**

**Definition of a Regulated Activity**

The provision of **health care** by any **health care professional** or the provision of health care under the direction or supervision of a health care professional is a regulated activity. The full, legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended (in particular, by

the Protection of Freedoms Act 2012)

**Regulated activity relating to children**

The new definition of ‘regulated activity’ relating to children comprises only:

(i) Unsupervised activities: teach, train, instruct, care for or supervise

children, or provide advice/guidance on well-being, or drive a vehicle

only for children;

(ii) Work for a limited range of establishments (‘specified places’), with

opportunity for contact: for example, schools, children’s homes,

childcare premises. Not work by supervised volunteers;

Work under (i) or (ii) is regulated activity only if done regularly

(iii) Relevant personal care, for example washing or dressing; or health

care by or supervised by a professional

(iv) Registered child-minding; and foster-carers

**Regulated activity relating to Adults**

The new definition of regulated activity relating to adults no longer labels adults as ‘vulnerable’. The new definition identifies the particular activities undertaken that lead to the adult being considered vulnerable at that particular time regardless of how often they are undertaken. The focus is on the activities needed by the adult, not where the activity takes place, i.e. the frequency test has been removed. An individual only needs to engage in the activities listed below once to be carrying out regulated activity relating to adults:

* Healthcare for adults provided by, or under the direction or supervision of a regulated health care professional
* Personal care for adults involving hand-on physical assistance with washing and dressing, eating, drinking and toileting
* Social work
* Assistance with an adult’s cash, bills or shopping because of their age, illness or disability arranged via a third party
* Assisting in the conduct of an adult’s own affairs under a formal appointment

Conveying (transporting) adults for reasons of age, illness or disability to, from, or between places, where they receive healthcare, personal care or social work arranged via a third party.

**APPENDIX 2**

**Equality Impact Assessment template**

**to be completed for all policies, procedures and strategies**

**Date of EIA: August 2022 Review Date: August 2025**

**Completed By: HR Business Manager/Recruitment Consultant**

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|  | **QUESTIONS** | **ANSWERS AND ACTIONS** |
| **1** | **What is being assessed?**  Prompt: what is the function of this document (new or revised) | **DBS Policy (revised)** |
| **2** | **Description of the document**  Prompt: What is the aim of this document | **To ensure suitable people are employed by the trust, preserve the safety and security of service users, carers and families and work colleagues. Ensure that the trust applies a consistent, fair and equitable process in the application of DBS checks.** |
| **3** | **Lead contact person for the Equality Impact Assessment** | **Sandy Stones, HR Manager/Recruitment Consultant**  **Paul Brown, HR Business Manager** |
| **4** | **Who else is involved in undertaking this Equality Impact Assessment** | **Human Resources, Employment Policy Group consisting of service managers, staff side and HR representatives.** |
| **5** | **Sources of information used to identify barriers etc**  Prompts: service delivery equality data – refer to equality dashboards ([BI Reporting - Home (sharepoint.com)](https://swyt.sharepoint.com/sites/BIReporting) satisfaction surveys, complaints, local demographics, national or local research & statistics, anecdotal. Contact [InvolvingPeople@swyt.nhs.uk](mailto:InvolvingPeople@swyt.nhs.uk) for insight  **What does your research tell you about the impact your proposal will have on the following equality groups?** | **Equality data regarding DBS checks that have been considered by the DBS panel is not available. The policy aims to standardise the approach to DBS checks across the trust to ensure consistency and fairness in approach. DBS panel members are not aware of any protected characteristics and decisions regarding the suitability of employment are based upon the facts on a case by case basis.** |
| **5a** | **Disability Groups:**  Prompt: Learning Disabilities or  Difficulties, Physical, Visual, Hearing  disabilities and people with long term  conditions such Diabetes, Cancer,  Stroke, Heart Disease etc. Accessible information standard | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
|  | **QUESTIONS** | **ANSWERS AND ACTIONS** |
| **5b** | **Gender:**  Prompt: Female & Male issues should be considered | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5c** | **Age:**  Prompt: Older people & Young People issues should be considered | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5d** | **Sexual Orientation:**  Prompt: Heterosexual, Bisexual, Gay,  Lesbian groups are included in this  Category | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5e** | **Religion & Belief:**  Prompt: Main faith groups and people with no belief or philosophical belief issues should be considered | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5f** | **Marriage and Civil Partnership**  Prompt: Single, Married, Co-habiting, Widowed, Civil Partnership status are included in this category | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5g** | **Pregnancy and Maternity**  Prompt: Currently pregnant or have been pregnant in the last 12 months should be considered | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5h** | **Gender Re-assignment**  Prompt: Transgender issues should be considered | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5I** | **Carers**  Prompt: Caring responsibilities paid or unpaid, hours this is done should be considered | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |
| **5j** | **Race**  Prompt: Indigenous population and BME Groups such as Black African and Caribbean, Mixed Heritage, South Asian, Chinese, Irish, new Migrant, Asylum & Refugee, Gypsy & Travelling communities.) | **No specific data available however it is not anticipated this policy will have a negative impact on specific groups. A system to collect equality data for DBS checks that are considered at panel will be developed and once data is available, this will be used to inform future policy reviews and changes.** |

**Action Plan**

EIAs are now reviewed using a grading approach which is in line with our Equality Delivery System (EDS). This rates the quality of the EIA. This means that the team can review the EIA and make recommendations only. The rating and suggested standards are set out below:

* + **Under-developed** – red – **No data**. **No strands** of equality
  + **Developing** – amber – **Some census data plus workforce**. **Two strands** of equality addressed
  + **Achieving** – green – **Some census data plus workforce. Five strands** of equality addressed
  + **Excelling** – purple –**All the data and all the strands** addressed

Potential themes for actions: Geographical location, built environment, timing, costs of the service, make up of your workforce, stereotypes and assumptions, equality monitoring, community relations/cohesion, same sex wards and care, specific issues/barriers.

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| **Who will benefit from this action?** | **Tick all that apply** | **Action 1:**  **This is what we are going to do** | **Action 2:**  **This is what we are going to do** | **Action 3:**  **This is what we are going to do** | **Lead/s** | **By When** | **Update/review outcome** | **RAG** |
| Age | / | To develop a system to capture equality data for DBS checks that are considered at panel | To analyse equality data once available to identify any barriers/trends requiring further examination or action. |  | DBS Team | Q3 2022 |  |  |
| Disability | / |  |  |  |  |  |  |  |
| Gender reassignment | / |  |  |  |  |  |  |  |
| Marriage and civil partnership | / |  |  |  |  |  |  |  |
| Race | / |  |  |  |  |  |  |  |
| Religion or belief | / |  |  |  |  |  |  |  |
| Sex | / |  |  |  |  |  |  |  |
| Sexual orientation | / |  |  |  |  |  |  |  |
| Pregnancy and maternity | / |  |  |  |  |  |  |  |
| Carers | / |  |  |  |  |  |  |  |

**6. Involvement & Consultation: New or Previous (please include any evidence of activity undertaken in the box below)**

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| Consultation with staff side via the Employment Policy Group and Trust Partnership Forum. This is a minor policy review as part of the scheduled review process. Learning from the operation of the policy & comments from Employment Policy Group members have been taken into account in updating the document. |

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| 1. **Methods of Monitoring progress on Actions**   Considering any issue that arise following the implementation of the policy and amending the documentation as required.  Development of a system to collate equality data.  Monitoring of compliance |

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| |  | | --- | | 1. **Publishing the Equality Impact Assessment**   As an appendix to the policy with copy available on the intranet. | |

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| |  | | --- | | 1. **Signing off Equality Impact Assessment:**     Greg Moores, Chief People Officer, Date: 9 August 2022 | |

***Once approved, you must forward a copy of this***

***Assessment/Action Plan by email to:***

[**InvolvingPeople@swyt.nhs.uk**](mailto:InvolvingPeople@swyt.nhs.uk)

**Please note that the EIA is a public document and will be published on the web.**

**Failing to complete an EIA could expose the Trust to future legal challenge.**

**Appendix 3**

**Checklist for the Review and Approval of Procedural Document**

|  | **Title of document being reviewed:** | **Yes/No/ Unsure** | **Comments** |
| --- | --- | --- | --- |
| **1.** | **Title** |  |  |
|  | Is the title clear and unambiguous? | YES |  |
|  | Is it clear whether the document is a guideline, policy, protocol or standard? | YES |  |
|  | Is it clear in the introduction whether this document replaces or supersedes a previous document? | YES |  |
| **2.** | **Rationale** |  |  |
|  | Are reasons for development of the document stated? | YES |  |
| **3.** | **Development Process** |  |  |
|  | Is the method described in brief? | YES |  |
|  | Are people involved in the development identified? | YES |  |
|  | Do you feel a reasonable attempt has been made to ensure relevant expertise has been used? | YES |  |
|  | Is there evidence of consultation with stakeholders and users? | EMT/  Employment Policy group |  |
| **4.** | **Content** |  |  |
|  | Is the objective of the document clear? | YES |  |
|  | Is the target population clear and unambiguous? | YES |  |
|  | Are the intended outcomes described? | YES |  |
|  | Are the statements clear and unambiguous? | YES |  |
| **5.** | **Evidence Base** |  |  |
|  | Is the type of evidence to support the document identified explicitly? | YES |  |
|  | Are key references cited? | YES |  |
|  | Are the references cited in full? | YES |  |
|  | Are supporting documents referenced? | YES |  |
| **6.** | **Approval** |  |  |
|  | Does the document identify which committee/group will approve it? | YES |  |
|  | If appropriate have the joint Human Resources/staff side committee (or equivalent) approved the document? | YES |  |
| **7.** | **Dissemination and Implementation** |  |  |
|  | Is there an outline/plan to identify how this will be done? | YES |  |
|  | Does the plan include the necessary training/support to ensure compliance? | N/A |  |
| **8.** | **Document Control** |  |  |
|  | Does the document identify where it will be held? | YES |  |
|  | Have archiving arrangements for superseded documents been addressed? | YES |  |
| **9.** | **Process to Monitor Compliance and Effectiveness** |  |  |
|  | Are there measurable standards or KPIs to support the monitoring of compliance with and effectiveness of the document? | YES |  |
|  | Is there a plan to review or audit compliance with the document? | YES |  |
| **10.** | **Review Date** |  |  |
|  | Is the review date identified? | YES |  |
|  | Is the frequency of review identified? If so is it acceptable? | YES |  |
| **11.** | **Overall Responsibility for the Document** |  |  |
|  | Is it clear who will be responsible implementation and review of the document? | YES |  |

**Appendix 4**

**Version Control Sheet**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Version** | **Date** | **Author** | **Status** | **Comment / changes** |
| 4 | February 2018 | Sandy Stones/Ashley Hambling | Review | Minor updating |
| 5 | May 2022 | HR Manager/Recruitment Consultant | Current | Review and minor updating in line with current processes |