
Quality Equality Impact Assessment (QEIA) Policy

NHS Devon Clinical Commissioning Group

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Approved by: <i>Simon Polak – Director of Quality Assurance (Interim)</i>	Date of formal approval 07/02/2019	Review Date: 01/02/2021
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All policies are held centrally by Governance: d-ccg.governance@nhs.net		

Document Change History:		
Version	Date	Comments (i.e. reviewed/amended/approved)
6	24/01/2019	Update in respect to: • QEIA process development within the CCG to include further clarification and justification as to when a QEIA should be undertaken. • Cost Improvement Programme (CIP) annual QEIA Panel review. • The Lookback review process (including criteria for review). Operational and System flowcharts supporting the policy/procedural changes made.
7	07/02/2019	Minor amendments made following Associate CNO review.
1.0	15/08/2019	Formatted in line with transition to single Devon CCG
1.0	14/11/19	Approval by Quality Assurance Committee 14 November 2019

Equality, diversity and inclusion statement

NHS Devon CCG is committed to the promotion of equal opportunities, addressing health inequalities and fostering of good relations between people protected under the terms of the Equality Act 2010, the Health and Social Care Act 2012 and Human Rights legislation. We are equally committed to the elimination of unlawful discrimination, harassment and victimisation. To demonstrate this commitment, we develop, promote and maintain policies, strategies and operating procedures. Every effort is made to ensure that patients, employees, contractors or visitors do not experience discrimination; either directly or indirectly, because of their vulnerability; disadvantage; age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex (gender) or sexual orientation.

All staff must comply with this policy. Compliance must reflect our organisational commitment to and policy on, equality, diversity and inclusion. In addition, each manager and member of staff involved in implementing this policy must give due regard to the needs of those protected under law.

If you, or any other groups, believe you are discriminated against under the terms of the Equality Act, the Health and Social Care Act 2012 or Human Rights legislation by anything contained in this document; or you need this document in an alternative format, for example, large print, Braille, Easy read or other languages; please contact our Patient Advice and Complaints Team (PACT):

Tel: 0300 123 1672
 Email: d-ccg.patientexperience@nhs.net,
 Post: Patient Advice and Complaints Team,
 FREEPOST EX184,
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 Topsham Road
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Contents		
Section	Title	Page
1	Policy Statement	4
2	Responsibilities	4
3	Governance and Assurance	5
4	Cost Improvement Plans and the QEIA process:	5

1.0 Quality and Equality Impact Assessment Policy:

1.1 Policy Statement:

To provide the necessary assurance* to NHS Devon CCG (The CCG) that the Quality and Equality Impact Assessment (QEIA) process is clearly defined and embedded within the commissioning decision-making processes across the CCG, the wider health economy and in place across the entire Sustainability and Transformation Partnership (STP).

To ensure that any proposed change to services commissioned within Devon have been robustly and openly challenged and that key impacts to quality of care continue to be delivered.

**Note: Such assurance evidences due regard and other statutory and/or mandatory requirements such as the Health and Social Care Act 2012, Equality Act 2010 and the NHS equality delivery system (2013).*

- 1.2 QEIA Tool is to be used across all STP programmes and has been formally adopted as the assessment process that all partner organisations should adopt.
- 1.3 The QEIA examines the extent to which a policy or strategy (including strategic decisions, service or function) may impact, either negatively or positively, or have limited impact on any groups of the community and, where appropriate, recommends alternative mitigation measures to ensure equal access to services and opportunities.
- 1.4 Impact assessment is a continuous process to help decision makers fully think through and understand the consequences of possible and actual impacts on quality, equality, wider health and social care organisations and other relevant system impacts within commissioning decisions, business cases, projects and other business plans.

2.0 Responsibilities:

- 2.1 The integration of the QEIA toolkit into the decision structures of the CCG must form a key component to all business of commissioning decisions affecting patients.
- 2.2 The CCG is responsible for ensuring that Quality and Equality Impact Assessments are effectively considered as part of discussions and decisions regarding Cost Improvement Programmes (CIPs), business cases and other service developments or change arising from commissioning activity.

- 2.3 The QEIA Panel will ensure that all QEIA assessments are reviewed prior to final approval by the governing body or delegated committee.
- 2.4 The QEIA Panel is responsible for oversight of the programme and for assuring themselves that QEIAs are carried out correctly and consistently. This is achieved through the membership.
- 2.5 All Governing Body members and staff who are involved in the development of policies, commissioning cases and service redesign initiatives are responsible for ensuring that Quality and Equality Impact Assessments (QEIAs) are conducted at an early stage and at key stages of programme management.
- 2.6 The Project Author/ Programme Manager and the relevant individuals involved in the completion of the assessment tool (known as the QEIA Author and Project Team) are responsible for undertaking impact assessments for each proposal.

3.0 Governance & Assurance:

- 3.1 All QEIAs should be completed using the most up to date version of the tool that can be downloaded from the CCG's website.
- 3.2 The Peninsula Collaboration for Health Operational Research and Development, PenCHORD, (academic specialists in operational research supporting healthcare professionals, commissioners and patients) reviewed the QEIA tool in terms of validity, usefulness and appropriateness. Subsequently, there has also been interest from the National Institute for Clinical Excellence and other NHS England organisations in the QEIA Toolkit.

An Evidence based review on the QEIA process can be viewed here: <http://clahrc-peninsula.nihr.ac.uk/research/penchord-qeia-tool-validation-and-improvement>

- 3.3 On completion, QEIAs will be reviewed by the QEIA Review Panel in line with the QEIA Panel terms of reference.

4.0 Cost Improvement Plans and the QEIA process:

- 4.1 Quality impact assessments are used throughout Devon as part of the review process for Cost Improvement Programmes (CIPs).

- 4.2 The CIP programmes aim to support the identification of schemes to increase efficiency or reduce expenditure. CIPs can include both recurrent (year on year) and non-recurrent (one-off) savings. CIPs are integral to all trusts' financial planning and require good, sustained performance in order to be achieved. CIP success varies among providers and no single approach works for all organisations.
- 4.3 However, several factors are common in organisations performing well in CIP planning, delivery and sustainability. A successful CIP is not simply a scheme that saves money. The most successful organisations will develop long-term plans to transform clinical and non-clinical services that not only result in permanent cost savings, but also improve patient care, satisfaction and safety.
- 4.4 The CCG expect all relevant providers to give assurances in respect to their development of CIP plans, utilisation of Impact Assessment tools, (including the STP approved QEIA tool)* and adherence to relevant regulator planning requirements. This process will be led by the CCG and will be undertaken on an annual basis, (built into the QEIA Panel forward planner).

**Note: The use of the QEIA tool is not mandated, however the CCG has given an open invitation to all providers to utilise the QEIA assessment tool for internal impact assessment.*