

Agenda Item No:	7
Date of Meeting:	24 th October 2019

Governing Body Meeting in Public

Paper Title:	Equality Impact Assessment
---------------------	-----------------------------------

Decision or Approval Discussion Information

Report author:	Nuala Milbourn, Assistant Director Communications and Engagement
Report signed off by:	Sheilagh Reavey, Director of Nursing and Quality

Executive Summary:	<p>This final equality impact assessment (EIA) takes account of the activities East and North Hertfordshire CCG (the CCG) has undertaken since the CCG's proposal to close the Urgent Care Centre overnight between 10pm and 8am was put to the public in June 2019.</p> <p>The initial EIA has been reviewed and updated with the information obtained during the subsequent 12 week public engagement process undertaken by the CCG.</p> <p>An equality impact assessment is the process of assessing the impact of a proposal and its consequences for equality. There is a legal obligation to undertake EIAs to assess the impact of proposals on groups identified by the Equality Act 2010 (called protected characteristics). These groups are as follows:</p> <ul style="list-style-type: none"> Age Disability Gender reassignment Disability Marriage and civil partnership Pregnancy and maternity Race Religion and belief Sex Sexual orientation Carers* (this group is not identified by the Equality Act 2010 but is considered by the CCG to require particular consideration). <p>Equality analysis is a way of considering the effect of a proposed policy on different groups.</p>
---------------------------	---

	<p>This is to:</p> <ul style="list-style-type: none"> • consider if there are any unintended consequences for some groups • considering what evidence there is to support the decision and identifying any gaps. <p>It involves using equality information, and the results of engagement with protected groups and others, to understand the actual effect or the potential effect of an organisation’s functions, contracts, policies or decisions.</p> <p>East and North Hertfordshire CCG is subject to the general public sector equality duty required by Section 149 of the Equality Act 2010. This states that the CCG must “have due regard to the need to:</p> <ol style="list-style-type: none"> 1. Eliminate discrimination, harassment, victimisation, and any other conduct prohibited by the Act 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.” <p>This involves:</p> <ul style="list-style-type: none"> • Removing or minimising disadvantages experienced by people due to their protected characteristics • Taking steps to meet the needs of people from protected groups where these are different from the needs of other people • Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low. <p>Carrying out an equality impact assessment helps the CCG to make sure it has considered the needs of people with protected characteristics. This means it can:</p> <ul style="list-style-type: none"> • identify unintended consequences and mitigate them as far as possible • actively consider how the proposed change might support the advancement of equality and fostering of good relations.
<p>Recommendations to the members:</p>	<ul style="list-style-type: none"> ▪ To note

Conflicts of Interest involved:	None.
--	-------

Conflict of Interest Definitions

The following table describes the sub-classifications of interests:

Type	Description
Financial Interests	This is where an individual may get direct financial benefits from the consequences of a commissioning decision.
Non-Financial Professional Interests	This is where an individual may obtain a non-financial professional benefit from the consequences of a commissioning decision, such as increasing their professional reputation or status or promoting their professional career.
Non-Financial Personal Interests	This is where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit.
Indirect Interests	This is where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision.

Equality Analysis – Full Equality Impact Assessment

This template is an adapted version of the NHS England Equality template which was published in September 2014 and is the current standard.

Version	Date of review	Reason for review and updates made	Person reviewing
V0.1	November 2018	First draft	Paul Curry, Equality and Diversity Lead, East and North Hertfordshire CCG
v.02	October 2019	Revised in the light of the CCG's public engagement process.	Paul Curry, Equality and Diversity Lead, East and North Hertfordshire CCG

Proposal to change the opening hours of the Urgent Care Centre at the New QEII Hospital, Welwyn Garden City

About this document – the role of an equality impact assessment

This final equality impact assessment (EIA) takes account of the activities East and North Hertfordshire CCG (the CCG) has undertaken since the CCG's proposal to close the Urgent Care Centre overnight between 10pm and 8am was put to the public in June 2019.

The initial EIA has been reviewed and updated with the information obtained during the subsequent 12 week public engagement process undertaken by the CCG.

An equality impact assessment is the process of assessing the impact of a proposal and its consequences for equality. There is a legal obligation to undertake EIAs to assess the impact of proposals on groups identified by the Equality Act 2010 (called protected characteristics). These groups are as follows:

- Age
- Disability
- Gender reassignment
- Disability
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation
- Carers* (this group is not identified by the Equality Act 2010 but is considered by the CCG to require particular consideration).

Equality analysis is a way of considering the effect of a proposed policy on different groups.

This is to:

- consider if there are any unintended consequences for some groups
- considering what evidence there is to support the decision and identifying any gaps.

It involves using equality information, and the results of engagement with protected groups and others, to understand the actual effect or the potential effect of an organisation's functions, contracts, policies or decisions.

East and North Hertfordshire CCG is subject to the general public sector equality duty required by Section 149 of the Equality Act 2010. This states that the CCG must "have due regard to the need to:

1. Eliminate discrimination, harassment, victimisation, and any other conduct prohibited by the Act
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it."

This involves:

- Removing or minimising disadvantages experienced by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

Carrying out an equality impact assessment helps the CCG to make sure it has considered the needs of people with protected characteristics. This means it can:

- identify unintended consequences and mitigate them as far as possible
- actively consider how the proposed change might support the advancement of equality and fostering of good relations.

Introduction

The local context:

NHS East and North Hertfordshire Clinical Commissioning Group (the CCG) is the organisation responsible for making sure that the 597,000 people in our area get the medical help, care and treatment that they need. This includes GP services, most planned hospital and community health services, mental health services and urgent and emergency care.

The CCG commissioned the Urgent Care Centre (UCC) for minor injuries and minor illness at the New QEII Hospital. The service opened in 2015 and is very well used overall, with an average of 118 people attending the centre every 24 hours.

However, data collected locally and verified by the national body, NHS England, shows that the service is not well used overnight. Between 10pm and 8am, less than one person per hour on average uses the UCC.

Due to ongoing recruitment difficulties, there is currently no doctor at the Urgent Care Centre after midnight. People who need to see a doctor between midnight and 8am therefore cannot 'drop in' to see one as they do during the day.

The UCC is staffed overnight by highly skilled nursing staff from East and North Hertfordshire NHS Trust, with a minimum of two clinical staff on duty at all times for patient and staff safety reasons. These staff treat an average of one patient each every two hours between 10pm and 8am. The same staff members would be expected to treat between 3-6 patients per hour each in an Accident and Emergency department, depending on the acuity of the needs of those patients.

The current staffing model means that children cannot be seen by the UCC's nurses between midnight and 8am.

X-rays are not available at the Urgent Care Centre after 11pm. Patients with minor injuries requiring an X-ray after 11pm need to attend an alternative location, such as the Lister Hospital in Stevenage, or wait until services resume at 8am.

The change in services available during the day and overnight at the UCC is not always widely understood by people in the local area. This means that some patients attend the centre with a need that cannot be met at that time and have to be directed to an alternative service, such as NHS 111 or the Lister Hospital.

We know that some patients currently wait longer to be seen at the Lister Hospital A&E department than is ideal. For this reason, East and North Hertfordshire NHS Trust supports the principle of re-allocating its scarce nursing resource from the UCC to the Lister Hospital overnight to help to meet demand.

For the reasons outlined above, between June and September 2019, the CCG engaged with the public, stakeholders and NHS staff on a proposal to close the UCC between 10pm and 8am. Under this proposal, patients who arrived before 10pm would be treated before the Urgent Care Centre closed for the night.

The national context: improving urgent and emergency care is one of the top priorities of the NHS. There is a continued focus on the need to treat all patients with an urgent or emergency care need in a timely way, in a setting that is appropriate to their needs. Local pilot projects are also underway to test new national treatment standards for those with the most serious and life-threatening injuries.

Our CCG works very closely with social care, acute hospital, ambulance service and GP colleagues to meet this requirement, against a difficult background of increasing demand, an ageing population and recruitment challenges.

New national guidance has been introduced by NHS England which requires all centres like the UCC to offer a standard set of services and to open for at least 12 hours a day, taking into account local demand:

“Urgent treatment centres should be open for at least 12 hours a day, seven days a week, including bank holidays, to maximise their ability to receive streamed patients who would otherwise attend an A&E department. Typically this will be an 8-8 service, but commissioners will wish to tailor to local requirements based on locally determined demand.”

The aim of this national guidance is to make it easier for the public to understand the services on offer, and to use them appropriately.

As a result, a decision has been made that in future, urgent services like those on

offer at the New QEII Hospital will be re-designated as 'urgent treatment centres' (UTCs), rather than Urgent Care Centres (UCCs).

NHS England has also decided that by December 2019, patients and the public will be able to visit UTCs that are open at least 12 hours a day, with access to tests like urine tests, heart tests (ECGs) and in some cases X-ray facilities.

NHS England has made it clear that as well as offering 'walk-in' services, people must be able to book appointments at UTCs through NHS 111. This should reduce uncertainty for patients about waiting times for treatment.

The public engagement process

The CCG's public engagement focused on the following areas:

1. The reasons behind the proposed closure of the QEII UCC between 10pm and 8am
2. The staffing issues faced by East and North Hertfordshire NHS Trust and the need for the CCG to commission services that make the best use of the limited numbers of clinical staff in the area
3. The alternative urgent and emergency services available to the public in the local area.

The evidence to support the rationale for engaging on these areas can be found in the public engagement document.

The independent research company ORS was commissioned by the CCG to collate and analyse the findings of the engagement process. This report is included in the Governing Body papers where it can be viewed in full.

As a result of the engagement process, two options have been brought forward for consideration by the Governing Body.

Option 1 is to proceed to close the Urgent Care Centre in line with the proposal outlined in the engagement document.

Option 2 is to keep the Urgent Care Centre at the New QEII Hospital open overnight until 31 March 2020 and implement a communications campaign to raise public awareness of the service and the wider urgent care and out-of-hours services available to the public. Any plan to retain the 24/7 opening hours at the UCC would need to demonstrate that the service remains viable, with sufficient, appropriate activity to justify the service remaining open through the night. The CCG will work with East and North Hertfordshire NHS Trust to quantify what levels of overnight activity represent a viable ongoing service. As such, patient activity numbers at the UCC would be reviewed at the end of March 2020 in order for the Governing Body to make a final decision on opening hours in April 2020.

What are the intended outcomes of this work?

Option 1

If the Governing Body decides to pursue Option 1, the CCG's intended outcomes are as follows:

- A comprehensive publicity campaign will raise awareness of the services available in their local area, planned changes to the opening times at the

UCC and overnight closure implementation date. This should result in more people becoming aware of the range of services available, reducing the number of avoidable attendances at the UCC and the Lister Hospital.

- The UCC will close to new 'walk-in' patients at 10pm every night. Patients who have already registered at the UCC prior to 10pm will be treated before the UCC closes for the night.
- The highly-qualified nursing staff who currently work at the UCC overnight will be re-allocated to work at the Lister Hospital's Accident and Emergency department. It is intended that this staffing increase will have a positive impact on patient experience and outcomes in terms of waiting times at A&E.
- Very senior nurses, called 'advanced nurse practitioners' will be recruited to increase the skill-mix of the staff who work at the UCC during opening hours.
- The UCC will be officially re-designated as a UTC, in line with national guidance.
- The services offered at the UCC will be the same throughout the hours during which it is open. Currently the availability of services varies depending on the time of day (e.g. X-ray closes at 11pm, children cannot be treated between midnight and 8am, there is no doctor available at the UCC to see patients who have 'walked in' after midnight). This consistency should improve public understanding of the services offered at the UCC.

Option 2

If the Governing Body decides to pursue Option 2, the intended outcomes are as follows:

- A comprehensive publicity campaign will raise awareness of the urgent, emergency and out-of-hours NHS services available in the local area, including those currently available at the 24/7 UCC. The CCG will seek to enlist the support of local stakeholders, such as local government representatives, to support this campaign.
- The UCC will be officially re-designated as a UTC, in line with national guidance.
- The CCG will work with East and North Hertfordshire NHS Trust to monitor attendance levels at the UCC until the end of March 2020. At this stage, a decision will be taken as to whether attendances have reached a level at which the continued overnight opening of the UCC can be justified.

How will these outcomes be achieved?

Following the Governing Body's decision, either the **Option 1** or **Option 2** outcomes will be achieved in partnership with the CCG's partner organisations – specifically East and North Hertfordshire Trust, (the operator of the UCC) Herts Urgent Care (the operator of Hertfordshire's NHS 111 service) and local stakeholders.

The public awareness campaigns necessary to support either Option 1 or Option 2 will draw on the findings outlined in the engagement report. The 'frequently asked questions' document produced and regularly updated during the course of the public engagement process will be used to inform the CCG about services which residents find confusing or difficult to access.

These questions and answers are hosted here on the CCG's website:

<https://qeiucc.enhertscg.nhs.uk/fags>

Who will be affected by this work?

Service users accessing the UCC

If the Governing Body decides to move to close the UCC overnight, people who want to access the services currently provided there between 10pm-8am will be affected.

Service users who need to see a doctor overnight will still be able to use NHS111 who will triage and, if required, offer the patient a telephone consultation with a clinician, an appointment at an out-of-hours base, a home visit, or will direct the patient to the emergency services if necessary. An out-of-hours GP base will continue to be located at the QEII Hospital. However patients who have a minor injury that requires treatment that cannot wait until the morning will need to travel to an Accident and Emergency department. Usage figures suggest that the number of patients that meet this criteria is very small.

If the decision is taken to close the UCC overnight, ENHT has committed to recruit very highly trained 'Advanced Nurse Practitioners' (ANPs) to add to the skill-mix of the staff working at the UCC during the day. ANPs are able to see and treat a wide range of patients, including patients who can currently only be seen at the UCC by a GP. This should help to reduce waiting times for patients who attend the UCC because they have a minor illness and cannot be treated by nursing staff. Detailed analysis has been undertaken to ensure that an ANP can treat the vast majority of patients currently seen by a GP. The national UTC guidelines require the unit to have GP leadership.

Service users accessing the Lister Hospital

If the Governing Body decides to pursue Option 1, it is expected that there will be a positive impact on service users attending the Lister Hospital Accident and Emergency department overnight as staffing levels will increase. This should result in an improved patient experience and outcomes as waiting times should reduce.

Staff

Depending on the outcome of the Governing Body meeting in October 2019, East and North Hertfordshire NHS Trust (ENHT) staff may be relocated to Lister A&E overnight. As the nursing staff currently rotate between both sites and are employed by ENHT who provide both services, it is not felt that this will pose a significant issue for this group. The Trust will need to engage with all affected staff (including administrative staff) to understand and explore any issues with them in the light of the Governing Body's decision.

The Trust will also need to engage with the facilities management company who provide services at the New QEII Hospital to determine whether either option is likely to affect their staffing needs.

Partner organisations

Herts Urgent Care (HUC)

HUC is the organisation that operates the NHS 111 service in Hertfordshire. Both options before the Governing Body require a publicity campaign to increase awareness of urgent and out-of-hours services, including NHS 111. As a result, we can reasonably expect to see an increase in the number of calls to NHS111.

This increase is in line with the CCG's drive to increase public awareness of the range of NHS services accessible to patients online and over the phone, reducing unnecessary journeys by providing the assurance that patients need.

HUC operates the out-of-hours GP base located at the New QEII Hospital. The out-of-hours GP base will remain open as usual and will continue to be one of the locations where booked GP appointments, accessible through NHS 111, can take place. If the decision is made to close the UCC overnight, HUC employees staffing the out-of-hours base may be required to redirect any patients who are not aware of the change of opening hours at the UCC and have attended without a booked appointment.

There will need to be a clear process in place, agreed with HUC, to ensure patients who arrive at the UCC in error are re-directed appropriately and safely.

Evidence

What evidence have you considered?

In order to update this assessment, information has been drawn from a wide range of sources, including the comprehensive 12 week public engagement process:

Questionnaire

As part of the engagement process, demographic data was collected with the permission of respondents to the CCG's questionnaire. This has provided further insight into whether specific groups of protected characteristics who responded to the questionnaire view the impact of the CCG's proposal in different ways. Responses have been analysed and incorporated into the Opinion Research Services report which forms part of the outcomes and recommendations report.

Responses relating to specific groups of protected characteristics are referenced in the relevant section below.

Focus groups

During the engagement process, in order to provide thoughtful consideration of the CCG's proposals by a representative sample of 'ordinary' members of the public, ORS recruited and facilitated two focus groups in August 2019. The purpose of these deliberative sessions was to allow ORS and NHS East and North Hertfordshire CCG to engage with, and listen to, members of the public about the proposed changes to the UCC and related issues - so that the participants would become more informed about the process, the case for change and the principles that form the basis of the proposal.

The focus groups were inclusive (encompassing a representative sample of the population of east and north Hertfordshire), not self-selecting (randomly recruited), relatively well-informed (following a presentation of the key issues and potential options by an expert CCG staff member with responsibility of urgent care services) and fairly conducted (through careful facilitation by ORS).

Concerns raised by focus group attendees about particular protected characteristics have also informed the relevant sections below.

Age

The table below details the breakdown in ages of patients attending the UCC in 2016/17.

Age Band	Total
Child 0-1	927
Child 1-5	3,662
Child 5-16	7,365
Adult 16+	32,200
Grand Total	44,154

Data source – 2016/17 enhanced trust-wide data set supplied by E&NHT

The information we hold about the age groups of people who use the Urgent Care Centre shows that children are frequent users of the UCC.

However, as children are currently not able to be seen between midnight and 8am at the UCC because there is no GP present, only those children who would have attended between 10pm and midnight would be affected if the decision is made to close the UCC at 10pm. If the proposal to close the UCC at 10pm goes ahead, patients of all ages will be able to be seen at the UCC during the time that it is open.

We will continue to work with agencies such as Hertfordshire County Council, family centres and schools to communicate to parents, carers and guardians the steps they need to take to access urgent medical help overnight for children. Children requiring a GP appointment out-of-hours will still be able to be seen at the UCC, as long as they have an appointment booked through the NHS 111 service.

The Welwyn Hatfield locality is home to the University of Hertfordshire. The vast majority of students will be registered with the university medical centre, but some, particularly those who may not be familiar with the area, may attend the UCC seeking urgent help. A national TV advertising campaign is due to launch in October 2019 promoting NHS 111 encouraging people to call the service or visit 111.nhs.uk, instead of worrying, self-diagnosing, or second-guessing what action to take with an urgent health problem. This campaign is targeted at those groups that NHS data show to be more frequent users of A&E departments, such as young adults. The CCG will reinforce this campaign with extensive local promotion of the Hertfordshire NHS 111 service.

We have carefully considered the number of concerns raised by individuals and stakeholders during the engagement period about how the proposal may affect older people, particularly with regard to those who do not have their own transport or who have limited mobility. Our attendance data shows that those aged 75 and upwards are the age group which uses the Urgent Care Centre the least. This could perhaps be because older people are more likely to seek help from the familiar surroundings of their GP practice or may be because older people are less likely to be able to

navigate the healthcare system. “Less than half (46%) of the elderly population have the confidence they know how to access the health and care system.”^[1] Because this older age group are already infrequent users of the service, we do not anticipate that any overnight closure would negatively impact on this cohort of patients.

Those aged 65 and over were the most common respondents to our engagement questionnaire (26% of all completed questionnaires). This age group was also the most supportive of the proposal to close the Urgent Care Centre overnight, with 52% in agreement.

Disability

Around 15,900 people in Welwyn Hatfield² stated that they had a long-term health problem or disability that limited their day-to-day activities to some extent. This is around 14% of the borough’s population.

Latest estimates³ suggest there are around 24,400 people in Hertfordshire who have a learning disability. The vast majority of these people are supported by Hertfordshire County Council’s Adult Disability Teams, who help service users with a learning disability to look after their health and access services.

The Urgent Care Centre does not routinely collect information about a patient’s disability when they attend to use the service, so there is no data available to show how many patients who use the UCC have a disability. There is no evidence that the overnight service is used more by those with a long term condition. Routine long term condition care is supported through primary care or specialist teams with the expert knowledge that the patient requires.

15% of those who responded during the engagement process declared they have a disability. Of those, 38% agreed with the proposal to close the UCC overnight and 61% disagreed.

Concerns were raised in the engagement responses about the impact on people with disabilities who would have to travel further to access health services overnight and might not have access to a car or be able to afford to order a taxi.

However, should the Urgent Care Centre close overnight, it is not anticipated that this will affect those with a disability disproportionately more than other groups.

This is because:

- access to a GP and urgent medical help will still be available at all times of the day or night by calling NHS 111 or using NHS 111 online. A textphone 111 service is also available for those with a hearing impediment. For those who are unable, due to their disability, to reach a local out-of-hours base to see a clinician, home visits by a GP are available
- the recent transport survey carried out by staff at the Urgent Care Centre shows that those people who do visit in the evening or overnight live in Welwyn Garden City or Hatfield. Almost all arrive by car, with a minority arriving by taxi or on foot

^[1] Khaldi, A (2013), A question of behaviours, cited by the [NHS Confederation](#).

² 2011 census data (latest available figures)

³ <https://www.poppi.org.uk> and <https://www.pansi.org.uk/>

- should the Governing Body agree to make changes to the opening hours, we will work with the Adult Disability Teams who provide help and support to those with a learning disability to ensure information about the change, plus information about the range of health services on offer, forms part of a person's 'purple folder' in a suitable 'easy read' format. This information would also reference the impending change in name from a UCC to a UTC.

Gender reassignment (including transgender)

The Equality Act 2010 protects anyone proposing to undergo, anyone who is undergoing or has undergone a process for the purpose of reassigning the person's sex. It is therefore important this is clearly understood and followed within NHS services, for both patients and staff who are transgender.

There is no data available on the usage of the UCC overnight by transgender people but it is not anticipated that closing the UCC overnight would negatively impact a person on the basis of his / her / their gender.

Marriage and civil partnership

Because this provision within the Equality Act applies to employment matters only, this is not relevant to this EIA.

Pregnancy and maternity

Around 5,500 women give birth at our area's maternity service at the Lister Hospital every year.

The Urgent Care Centre does not offer specific care for pregnancy-related concerns. Pregnant women who experience pregnancy-related health issues are advised to contact their maternity service for support. This information is provided in women's patient-held notes and is reinforced by community midwives.

Therefore it is not anticipated that any overnight closure would negatively impact this group of patients.

It should be noted that less than 50% of those people who responded to the CCG's questionnaire and declared that they were pregnant or providing maternity care agreed with the proposal to close the UCC between 10pm-8am.

Race

The available data for east and north Hertfordshire (2011) suggests that around 10% of the population are from a black or minority ethnic background. In Welwyn Hatfield this proportion increases to around 23%.⁶

⁶ https://www.welhat.gov.uk/media/9345/Demographic-profile-of-Welwyn-Hatfield/pdf/Demographic_Profile_-_2018.pdf?m=636749457850500000

92% of respondents to our engagement questionnaire defined their ethnicity as White British with 8% being from a black or minority ethnic (BME) background.

The majority of patients attending the unit are white British (72%) and this is comparable with the figure for the Welwyn Hatfield area (76%) and Hertfordshire as a whole (80.82%).⁷

No evidence has been put forward to suggest that different options for opening hours will impact on ethnic groups in a way that is different from the population as a whole.

In 2011, 91.44% of Welwyn Hatfield residents had English as their main language. Approximately 1% of residents did not have English as a main language and could not speak English well. 0.13% of residents could not speak English at all.⁸ The need to provide information about alternative services in different languages was raised during the engagement process. The requirement to re-name the service may impact on groups whose first language is not English.

Gypsy and traveller communities are known to sometimes encounter difficulties in registering with a GP surgery and therefore might be more likely to visit hospital-based services like A&E, urgent care centres or minor injuries units as a viable alternative.¹⁰

There are 57 public and private pitches for the gypsy and traveller community in the borough of Welwyn Hatfield (2018).¹¹ If the UCC were to close overnight the CCG will need, through the [Hertfordshire Gypsy Service](#), to provide information on NHS 111 in an accessible format to ensure that this community is able to access urgent care for themselves and their family.

65% of non-white respondents to our questionnaire stated that they would not agree with the proposal to close the UCC between 10pm-8am.

The Urgent Care Centre has access to a telephone interpreting service to support consultations with patients who would find it difficult to communicate their health concerns in English. Patients can also access the Language Line service.

Dependent on the Governing Body's decision, posters, leaflets and other communications materials will be provided and we will work with other local stakeholders to ensure that messages reach the appropriate audiences. Should there be a change in overnight provision, the CCG would look to provide signage at the UCC in the most commonly spoken languages, advising people to call NHS 111 when the service was closed. We would also work with community leaders to get this message widely circulated.

⁷ Data sources – 2016/17 enhanced trust-wide data set supplied by E&NHT and Office for National Statistics, 2011 Census data

⁸ https://www.welhat.gov.uk/media/9345/Demographic-profile-of-Welwyn-Hatfield/pdf/Demographic_Profile_-_2018.pdf?m=636749457850500000

¹⁰ http://eprints.brighton.ac.uk/8893/1/FFT_published_Report_.pdf

¹¹ https://www.welhat.gov.uk/media/13613/EX76-WHBC-GTAA-2016-Updated-March-2018/pdf/EX76_WHBC_GTAA_2016_Updated_March_2018.pdf?m=636622467670100000

Religion or belief

There is no evidence to suggest that the issue of opening hours would impact on people differently according to their religious belief or non-belief.

Sex

The available data shows that there is a relatively even split between men and women accessing the services available at the UCC.

The table below details the breakdown between male, female and not specified.

Sex	Total
Male	21,268
Female	22,885
Not specified	1
Grand Total	44,154

Data source – 2016/17 enhanced trust-wide data set supplied by E&NHT

Public engagement questionnaire responses

A higher proportion of men than women strongly disagreed with the proposal to close the Urgent Care Centre between 10pm and 8am. However both men and women tended to disagree with the proposal to close the UCC between 10pm and 8am.

The UCC offers universal minor injury and minor illness services only. There are no maternity, well-man or well-woman services or clinics at the UCC that are specifically relevant to members of a particular protected characteristic.

Feedback from the public did not raise any specific issues relating to sex.

Sexual orientation

It is not anticipated that this proposal would negatively impact on anyone on the basis of their sexual orientation. Services are accessible to all, regardless of their sexual orientation.

Feedback did not raise any specific issues relating to sexual orientation.

Other identified groups

Carers

East and North Hertfordshire NHS Trust does not collect data on the number of carers who use the UCC.

Although carers are not included as one of the protected characteristics groups legislated for under the Equality Act, NHS East and North Hertfordshire CCG considers the impact of its policies and decisions on those who provide unpaid care for a family member or close friend and who define themselves as a 'carer'.

Public engagement questionnaire responses

65% of those respondents to our public engagement who identified themselves as having a caring role disagreed with the proposal to close the UCC between 10pm-8am.

Carers who care for someone with a long term condition that requires inpatient, emergency or critical care are not currently seen at the QEII UCC, so the proposal to close the UCC overnight should not have a direct impact on the care that their friend or family member currently receives.

Carers of children who need to access health services overnight will be able to contact NHS 111 to get advice and a booked appointment, if necessary, regardless of whether the UCC closes overnight or not.

The current service at the QEII UTC does not see children between midnight and 8am, therefore if the proposal to close the service at 10pm overnight went ahead, the service would be reduced by a two hour period only.

Engagement and involvement

How have you engaged stakeholders with an interest in protected characteristics in gathering evidence or testing the evidence available?

As part of the engagement process we have:

- followed NHS England national guidance on Urgent and Emergency Care
- analysed information about when and why the Urgent Care Centre is used
- engaged with parish, district, town and county councillors
- had discussions with local politicians
- worked with NHS England and neighbouring NHS organisations
- taken advice from representatives of Hertfordshire County Council's health scrutiny committee
- talked to the patient representative organisation Healthwatch Hertfordshire
- discussed key issues with local voluntary organisations
- engaged with organisations that represent groups with protected characteristics
- involved local GPs and patient group representatives.

How have you engaged stakeholders in testing the policy or programme proposals?

To recap, the engagement period ran between 13 June and 4 September 2019. During this period, residents and other stakeholders were invited, and given opportunities, to provide feedback, including:

- a questionnaire which was available online; paper questionnaires were widely circulated and available on request. An easy read version was also available

- two deliberative focus groups with members of the public both held at the CCG's office at Charter House, Welwyn Garden City
- engagement activities hosted by or attended by CCG representatives including drop-in sessions around the area and meetings
- answering queries raised during the process through social media sites.

Residents, stakeholders and organisations were also able to provide their views by writing to the CCG or ORS, and a petition was submitted. The objective was that those who gave feedback and asked questions in the engagement period had their questions/ queries answered as fully as possible, to help them feel assured the information provided sufficiently covered these.

For each engagement activity, please state who was involved, how and when they were engaged, and the key outputs:

Full details of the engagement activities undertaken are including in the independent report produced by Opinion Research Services which is included at Appendix 2 of the Governing Body report.

Summary of analysis

Considering the evidence and engagement activity you listed above, please summarise the impact of your work.

In summary, the majority of the Hertfordshire population who responded to the engagement process agreed with the principles set out in the engagement document and recognised the need for change. However, the majority of those who responded disagreed with the proposal to close the Urgent Care Centre between 10pm-8am.

Observations noted through the engagement process are as follows:

- respondents who live in the Welwyn Hatfield area are more likely to disagree with the proposal to close the UCC between 10pm and 8am
- those who responded saying that they have used the service at the UCC overnight are more likely to disagree with the proposal to close the UCC between 10pm and 8am
- there was a lack of understanding amongst some residents of the range of urgent, emergency and out-of-hours services available in the local area
- people who responded often highlighted concerns on behalf of other groups, such as older people. These concerns were not reflected in the same way by members of those groups in their own responses
- people who were involved in face-to-face conversations in meetings, drop-ins and through facilitated focus groups and therefore had the ability to ask questions and find out more about the proposals and the range of alternative services available are more likely than others to agree with the proposal to close the UCC overnight.

The findings of the engagement process will inform the communications campaign which will support either the implementation of Option 1 or Option 2.

Particular attention will be paid to the need to communicate with groups known as

'hard to reach' or 'hard to hear'. The effectiveness of face-to-face and social media conversations as a way to engage effectively with groups who are otherwise less likely to get involved with policy development at the CCG has been noted and will inform the communications campaign.

Now consider and detail below how the proposals could support the elimination of discrimination, harassment and victimisation, advance the equality of opportunity and promote good relations between groups (the General Duty of the Public Sector Equality Duty).

Eliminate discrimination, harassment and victimisation

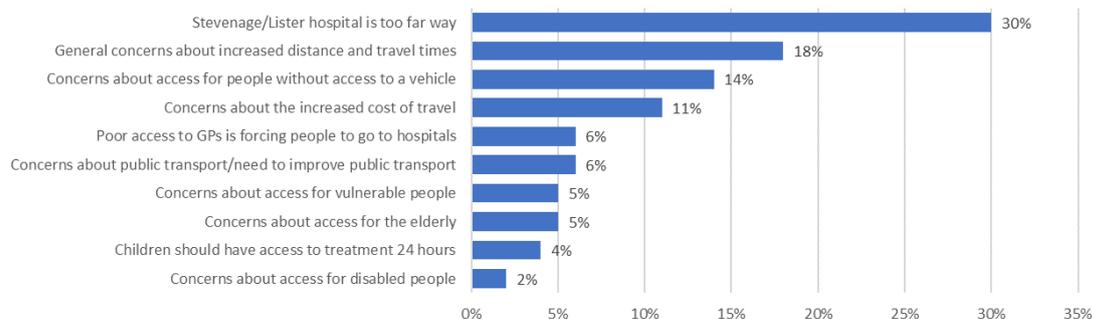
East and North Hertfordshire NHS Trust has a policy and procedures in place to eliminate discrimination, harassment and victimisation.

Advance equality of opportunity

The engagement process highlighted that concerns about travel and access to urgent care services were raised as an issue for a number of respondents, who considered that a number of protected characteristics could be disproportionately affected by the proposal (age, disability). The CCG is not responsible for patient transport of this kind. However the CCG can encourage and work with partner organisations to bring this issue to their attention, in an effort to bring about improvements in public/voluntary transport provision.

It is important to note that if the proposed overnight closure of the UCC goes ahead, it will still be possible for residents to access urgent overnight health advice and GP appointments in Welwyn Garden City via the NHS 111 service.

Concerns about travel and access to urgent care services



Promote good relations between groups

There will be continued engagement with staff, stakeholders and the public through the mechanisms detailed earlier in the document.

If the Governing Body pursues Option 1 then a staff engagement process will commence in line with East and North Hertfordshire NHS Trust's HR procedures and guidance.

Next steps

A concerted effort to raise awareness of local NHS services will take place regardless of the option chosen by the Governing Body. However, a decision to proceed with Option 1 will require a carefully designed communications and engagement approach to ensure information about service changes is accessible to all groups with protected characteristics.

Local stakeholders – such as the local MP, parish, town, district and county councillors will be asked to support the CCG to ensure that essential messages about NHS services are disseminated widely across the population.

This completed EIA will be published on the CCG's website and shared at the Governing Body meeting in public on 24 October 2019.

Statement from the CCG's Equality and Diversity Lead

Proposal to change the opening hours of the Urgent Care Centre at the New QEII Hospital, Welwyn Garden City

This equality impact assessment (EqIA) considers the two options being proposed. It provides significant and useful evidence from the public consultation that has taken place, including analysis by equality group where that information is available. It uses the evidence to identify potential impact.

It is worth noting that there is a difference between a consulted group's view on a proposal and the impact of that proposal on equality groups should it be implemented and decision makers should assure themselves that the impact identified and/or the assumptions made are reasonable.

Overall, it is likely that there is sufficient information in the EqIA to support decisions makers to be able to show Due Regard as required by the Equality Act 2010.

Paul Curry
Equality and Diversity Lead
22 October 2019