

Equality impact assessment

Title of policy, project or proposal:

Mobile Devices Policy

Name of lead manager: Trudie Higby

Directorate: Performance & Delivery

What are the intended outcomes of this policy, project or proposal?

To set out the criteria against which staff are measured for eligibility for a mobile IT device and appropriate use of any device, including a loan device from the Business Management Team's 'pool'

Evidence

Who will be affected by the policy, project or proposal?

Identify whether patients, carers, communities, CCG employees, and/ or NHS staff are affected.

CCG Employees are affected by this policy.

The policy covers the issuing of the following devices:

Type of device	Total number of devices held by CCG employees
Laptops	95
Mobile Phones	106
iPads	15
Data Sticks	48
4g Sim	135

A pool of 15 laptops is also held by the Business Management Team for loaning out short term to staff as and when required.

The business manager reviews Vodafone bills to check for the following:

- Overspends
- Misuse
- Non usage for the previous 6 months

During the review period there were:

- 2 overspends identified and managed by relevant line managers. No occasions of misuse identified.
- 10 users identified who had not used phone/4g sim for 6 months. The Business Manager contacted each user to ask if the device was still needed and the result was 7 users no longer required either the phone / 4g sim. The phone users preferred to keep just one phone and found having two inconvenient and the 4g sim users connected to Wi-Fi.
- The protected characteristics of staff were not relevant to the overspends or none use.

Age

Consider and detail (including the source of any evidence) the impact on people across the age ranges.

Evidence shows that the level of disability increases with age. For example from age 50 to 64 being limited in paid work impacts 23% of men and 28% of women (OECD 2017). This suggests that older employees are more likely to require reasonable adjustments in the workplace including provision of mobile devices or other information technology. See below.

Disability

Consider and detail (including the source of any evidence) the impact on people with different kinds of disability (this might include attitudinal, physical and social barriers). Certain medical conditions are automatically classed as being a disability – for example, cancer, HIV infection, multiple sclerosis.

An employee with a disability may experience issues with standard IT kit. In these cases they should discuss their individual needs with their line manager. The CCG will consider the needs of staff with disabilities and the potential for providing technology to help overcome difficulties stemming from these disabilities. This will be done on a case by case basis and in partnership with the employee, so that individual needs can be met.

Staff that have a visual impairment, are blind, hearing impaired or those with dexterity or movement limitations may experience difficulties with standard hardware and software. The policy has been amended so a more suitable alternative can be sourced..

During the review period one member of staff has had specialist equipment issued and three staff have had software solutions added to enable them to work effectively.

Dementia

Given the CCGs commitment to commissioning 'Dementia Friendly' services, consider and detail any impact on people with dementia.

We currently do not have any employees with diagnosed dementia.

Gender reassignment (including transgender)

Consider and detail (including the source of any evidence) the impact on transgender people. Issues to

consider may include same sex/ mixed sex accommodation, ensuring privacy of personal information, attitude of staff and other patients.

There is no specific impact on this characteristic.

Marriage and civil partnership

Note: This protected characteristic is only relevant to the need to eliminate discrimination within employment. Where relevant, consider and detail (including the source of any evidence) the impact on people who are married or in a civil partnership (for example, working arrangements, part-time working, infant caring responsibilities).

There is no specific impact on this characteristic.

Pregnancy and maternity

Consider and detail (including the source of any evidence) the impact on women during pregnancy and for up to 26 weeks after giving birth, including as a result of breastfeeding.

Employees on maternity leave are permitted to keep any devices while away from the office, to enable them to keep in touch and similarly they can hand back in if they wish. Guidance from HR is to ensure that if users want to keep devices, this needs to be allowed and it is an individual's personal choice.

The policy will be amended to reflect at section 7.3:

Users on maternity leave are entitled to keep devices whilst away from the business and will be asked for their preference, before maternity leave commences.

Religion or belief

Consider and detail (including the source of any evidence) the impact on people with different religions, beliefs or no belief. May be particularly relevant when service involves intimate physical examination, belief prohibited medical procedures, dietary requirements and fasting, and practices around birth and death.

There is no specific impact on this characteristic.

Sex (gender)

Consider and detail (including the source of any evidence) the impact on men and women (this may include different patterns of disease for each gender, different access rates).

The evidence suggests that female employees are slightly more likely to have a disability that impacts their work than male staff (see Age above).

Sexual orientation

Consider and detail (including the source of any evidence) the impact on people who are attracted towards their own sex, the opposite sex or to both sexes (lesbian, gay, heterosexual and bisexual people).

There is no specific impact on this characteristic.

Carers

Consider and detail (including the source of any evidence) the impact on people with caring responsibilities. This must include people who care for disabled relatives or friends (as they are protected by discrimination by association law), but you should also consider parent/ guardian(s) of children under 18 years. Carers are more likely to have health problems related to stress and muscular-skeletal issues, they may have to work part-time or certain shift-patterns, or face barriers to accessing services.

Employees with caring responsibilities may benefit from flexible working options that are supported by provision of mobile devices and information technology There is need to reference this in the policy (see added section 7.4)

Serving Armed Forces personnel, their families and veterans

The needs of these groups should be considered specifically. The CCG has a responsibility to commission all secondary and community services required by Armed Forces' families where registered with NHS GP Practices, and services for veterans and reservists when not mobilised (this includes bespoke services for veterans, such as mental health services).

There is no specific impact on this characteristic.

Meeting psychological needs

The CCG is working to improve how services meet the psychological needs of patients. This recognises that an individual's experience of disease or illness, and/or their experience of treatment and time spent in care settings can cause stress and anxiety. This in turn, can impact on treatment and outcomes.

Do you have evidence of additional or unmet psychological need? Identify how the project, policy or decision could better meet the psychological needs of patients and carers. This might include staff training in Mental Health First Aid, signposting patients to sources of mental wellbeing support, provision of peer support or psychological therapy.

The policy has no specific impact on this area.

Other identified groups

Consider and detail (including the source of any evidence) the impact on any other identified groups. Given the demography of west Hampshire this should include impact of:

- Poverty
- Living in rural areas
- Resident status (migrants and asylum seekers).

There is no specific impact on these areas.

Involvement and consultation

For each engagement activity, briefly outline who was involved, how and when they were engaged, and the key outputs

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

Consulted Human Resources Team about how we should manage mobile devices and information technology provided to employees that go on maternity leave.

How have you involved/ will you involve stakeholders in testing the policy, project or proposals?

Business Manager / Business Management team offer support to anybody wishing to request a device, to ensure a clear rationale and justification linking to business or personal need as described in the policy.

As part of policy review we intend to take the amended policy to the CCG Staff Forum for comment and feedback. The policy will be amended further if necessary.

Equality statement

Considering the evidence and engagement activity you listed above, please summarise the findings of the impact of your policy, project or proposal. Consider whether the evidence shows potential for differential impact, if so state whether adverse or positive and for which groups.

The West Hampshire Clinical Commissioning Group (CCG) Mobile Devices Policy sets out the criteria for eligibility for a mobile IT device, and appropriate use of any device, including a loan device from the Business Management Team's 'pool'.

CCG Employees are affected by this policy.

The policy covers the issuing of the following devices:

Type of device	Total number of devices held by CCG employees
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A pool of 15 laptops is also held by the Business Management Team for loaning out short term to staff as and when required.

The business manager reviews Vodafone bills to check for the following:

- Over spends
- Misuse
- Non usage for the previous 6 months

During the review period there were:

- 2 over spends identified and managed by relevant line managers. No occasions of misuse were identified
- 10 users identified who had not used mobile phone/4G sim for 6 months. The Business Manager contacted each user to ask if the device was still needed, and a result, 7 users no longer required either the phone / 4G sim. The phone users preferred to keep just one phone and found having two inconvenient and the 4G sim users connected to Wi-Fi.
- The protected characteristics of staff were not relevant to the over spends or none use.

Based on the evidence gathered and involvement work with staff, the Mobile Devices Policy has a medium to high impact on the protected characteristics of disability, age, pregnancy and maternity, and gender. Plus staff with caring responsibilities for whom provision of mobile devices/ information technology can facilitate flexible working.

Positive impacts

Where there is evidence, provide a summary of the positive impact the policy, project or proposal will have for each protected characteristic, and any other relevant group or policy consideration. This should include outlining how equal opportunities will be advanced and good relations fostered between different groups.

- The Mobile Devices Policy supports the CCGs duty to make reasonable adjustments for employees with disabilities. When the policy was written section 7.2 was included to take into account staff's individual needs around disability

In the review period 4 members of staff identified themselves as needing specialist equipment/software/applications adaptations to enable effective working. This was provided

- Employees on maternity leave are permitted to keep any devices while away from the office, to enable them to keep in touch and similarly they can hand back in if they wish. Guidance from HR is to ensure that if users want to keep devices, this needs to be allowed and it is an individual's personal choice. The policy will be amended to reflect this (see section 7.3 of policy)
- Employees with caring responsibilities may benefit from flexible working options that are supported by provision of mobile devices and information technology. The policy has been amended to reflect this and make reference to the Leave and Flexible Working Policy.

Negative impacts

Where there is evidence, provide a summary for each protected characteristic and any other relevant group or policy consideration. If the evidence shows that the policy, project or proposal will or may result in discrimination, harassment or victimisation this **must be** outlined.

Following the Business Manager review around non usage of mobile phones/4G for 6 months. Six phones returned as users finding it inconvenient to have a business and personal device and that was the reason they had not used device for 6 months. These devices were returned voluntarily and as staff are now using personal phones there is the potential for financial disadvantage, although banding range is 7-8 rather than the lower bands and also due to current phone contracts and Wi-Fi easily accessible, out of pocket costs are likely to be minimal.

We will ask staff who give up their work mobile to flag whether there has been a detrimental financial impact financially as part of policy monitoring.

Health inequalities

Please outline any health inequalities highlighted by the evidence (for example, differential access to services or worse health outcomes for particular groups or localities).

There are no identified inequalities introduced by the policy

Action planning for improvement, and to address health inequalities and discrimination

Please give an outline of the key actions based on any gaps, challenges and opportunities you have identified. Include here any general action to address specific equality issues and data gaps that need to be addressed through consultation or further research.

Action	Person responsible	By date	Progress/ review (Add new actions if required)
1. Add new section 7.3 to policy as follows: <i>Users on maternity leave are entitled to keep devices whilst away from the business and will be asked for their preference, before maternity leave commences.</i>	CCG Business Manager	9 November 2018	
2. Add a new section 7.4 to policy to state: <i>Employees with caring responsibilities may benefit from flexible working options that are supported by provision of mobile devices and information technology. Requests from these employees will be considered in line with the Leave and Flexible Working Policy</i>	CCG Business Manager	9 November 2018	
3. We will ask staff who give up their work mobile to flag any detrimental financial impact as part of policy monitoring.	CCG Business Manager	Ongoing	
4. Take the amended policy to the CCG Staff Forum for comment and feedback. The policy will be amended further if necessary.	CCG Business Manager	Date to be confirmed	

For your records

Name(s) of person who carried out this assessment: Trudie Higby Business Manager and Nick Birtley Equality and Diversity Manager

Date assessment completed: 29 October.2018

Date to review actions: November 2021

Name of responsible Director: Beverley Goddard	
Date assessment was approved: 5 November 2018	