

Equality Impact Assessment (EIA) Template

1	Name of the Policy/Guidance document or project/programme	COVID-19 Response (Internal colleagues)	
2	Directorate	Organisational wide	
3	Details of the person	Name: Safina Nadeem Job Title: Diversity and Inclusion Manager Contact Safina.nadeem@cqc.org.uk Details: Output	
	responsible for the EIA		
4	What are the main aims and objectives of the Policy/Document/ project or programme	To ensure impacts of COVID-19, social distancing guidelines and new ways of working for our staff are highlighted and any negative impacts are mitigated, reduced or removed.	

5. Engagement and involvement

Who have you consulted with as part of this EIA? E.g. Staff Networks, Trades Unions, groups of people who use services, providers

Equality Staff Networks Human Resources team Equality Diversity Human Rights Team Wellbeing Lead

6	a) Impact	b) Mitigation
	Is the policy, project or programme likely to have a <u>differential</u> impact on any of the protected characteristics? If so, is this impact likely to be positive or negative?	Can any potential negative impact be justified? If not, how will you mitigate, reduce or remove any negative impacts?
	Consider:	Think about reasonable adjustments Consider positive action

	 How does the policy, project or programme help us meet our public sector duty of :- Eliminating Unlawful discrimination Advancing Equality of Opportunity Promoting good relations between groups Does the policy exclude individuals with a protected characteristic e.g. females, older people etc?	Consider how you would measure and monitor the impact going forward e.g. equality monitoring data, analysis of complaints.
	What does existing evidence show? E.g. consultation from different groups, demographic data, questionnaires, equality monitoring data, analysis of complaints	
	For internal policies, projects or programmes, you need only consider impacts on CQC staff. For external facing policies, projects and programmes you should consider others affected by the proposals, such as people using health and social care services and people working for providers.	
Age		
	Current age profile	Ensure our older colleggues have the right
	Age 8% 20-29 8% 30-39 27% 40-49 27% 50-59 29% 60+ 8%	Ensure our older colleagues have the right support to work from home and managers have conversations with their colleagues if they feel vulnerable. <u>The CQC Employee</u> <u>information pack</u> has been developed for staff and has clear guidance on how to report sickness and or have COVID 19 symptoms.
	Evidence tells us that older people are more likely to develop serious ill health if they contract COVID 19 so our ability to respond well to COVID 19 will have a larger impact on older colleagues.	Health and Safety advice shared widely. Homeworking checklist is communicated widely.
	Younger colleagues may feel more isolated if living alone.	Regular Wellbeing comms will give information on staying connected and maintaining physical and mental health
	We know that our younger colleagues particularly in London and NCSC are more likely to be in a shared house so may have limited access to space for homeworking.	Promote Lone working app and ensure this is on all staff mobiles or can be accessed via intranet.
		Guidance for short-term home working has been produced and shared.
		Managers to continue to have conversations with their staff to help remove any barriers to homeworking, including lack of space.
		Homeworking top tips have been developed to support colleagues to

Carers / People with caring responsibiliti es	Carer Profile Our recent People Survey 2019 showed 46% of our colleagues identified as carers (this includes primary, secondary and multiple carers). This includes caring for children, disabled and older adults. Carers are a more likely to be in contact with people who are more vulnerable to COVID 19. Closure of schools and other childcare facilities due to COVID 19 will have a disproportionate impact on our colleagues who are carers of children. Colleagues may feel stressed if not feeling productive at work or being able to work their full-time hours as this links to feelings of self- worth and value. Single parents may be under more pressure due to not having support available. Carers may be concerned about the level of life-saving care that will be offered if the person they care for has a medical condition. Carers may also need more time away from work to organise caring responsibilities, e.g. picking up medication, shopping, personal care and general wellbeing support. This can be exacerbated by services withdrawing their support due to isolation measures Carers may also be concerned and stressed if they cannot see or support people/children they are caring for because of visiting restrictions and isolation measures. This can negatively impact on emotional wellbeing Other factors that can contribute to stress for carers include limited availability of food deliveries and having to pick up medication that requires leaving the house, as the bousehold of those who are extremely	 consider mental and physical wellbeing as well as staying connected. PAM assist Employee Assistance Programme includes a 24 hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support The new <u>CQC Employee Information Pack</u> has been produced and published on the intranet and included in daily internal engagement bulletins. The information pack is updated regularly which covers advice and guidance on School and Childcare closures. The guidance includes giving flexibility to colleagues to work their hours differently to enable a blended approach of working from home whilst looking after children. Weekly calls by our Chief Executive , Ian Trenholm, have encouraged staff and managers to have open conversations about what flexibility is required for colleagues to work at their best and sensitively discuss these requirements and support where possible. This could include the following: - reducing work targets being flexible with deadlines agreeing that a full day may not be possible to work or a full 37-hour week compressing hours Change working hours to fit with support available Encouraging all colleagues with caring responsibilities, not just those related to childcare, have conversations with their line manager about their specific circumstances and any additional pressures they may currently be facing. Ensure that people have regular 1:1 conversation with managers for reassurance that current situation is unique and temporary.
		levels. Support and signposting from CQC's Carers Equality Network

	Carers may feel more stressed by the prospect of getting ill and what would happen to the people/children they are caring for.	Contact for helplines /external support organisations will be included in the Employee Information pack and will be promoted through network intranet pages. Managers to be flexible about travel where colleagues are caring for high risk COVID 19 groups Homeworking top tips have been developed to support colleagues to consider mental and physical wellbeing as well as staying connected. PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support
Disability	 Disability profile 8% of our colleagues at CQC have told us they have a disability. People with underlying health or long-term health conditions and weakened immune system are more likely to develop serious ill health if they contract COVID 19. Closure of offices, schools and other care facilities will have a significant impact on our disabled colleagues including: Lack of reasonable adjustments in place at home if usually office-based Possible heightened anxiety Impact of social distancing on mental health Colleagues with mental health conditions whether diagnosed or not may not be able to access their regular face to face support and or not be able to access treatments Managers may not be able to pick up mental health due to reduced face to face time with their teams Disabled people may have concerns relating to the decision-making around live-saving care and equipment. The BMJ guidelines initially suggested that those with other conditions may be less likely to receive life-saving care. 	Ensure colleagues have the right support to work from home and managers have conversations with their colleagues if they feel vulnerable. <u>The CQC Employee</u> <u>information pack</u> has clear guidance on how to report sickness and or have COVID 19 symptoms. Reasonable adjustments requests for equipment at home have been prioritised. Health and Safety advice shared widely. Homeworking checklist is communicated widely. Regular Wellbeing communication and newsletter will provide information on staying connected and maintaining physical and mental health. Promote Lone working app and ensure this is on all staff mobiles or can be accessed via intranet. Mental health training programmes are being rolled out and priority given to managers who are currently managing colleagues with mental health conditions Creating an environment where people feel they can talk about mental health openly through connectivity events and Diversity & Inclusion virtual conversations.

		We are ensuring that people have regular 1:1 conversations/catch up with managers. Support and advice available from CQC's Disability Equality Network Contact for helplines /external support organisations will be included in the Employee Information pack and will be promoted through network intranet pages. PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support. Virtual health and wellbeing activities facilitated by the OD team and individual directorates.
		directorates.
Race / Ethnicity	Currently 12.4% of our colleagues are from a BME background.	Line managers having conversations with colleagues about worries and anxieties.
	The following issues may need to be considered for BME colleagues:	Encourage managers to be open and sensitive in understanding family dynamics and being flexible.
	Increased worry about family members overseas may heighten anxiety and colleagues may need to have contact at different times during day or night.	Any hate incidents are discussed with line managers, recorded and encouraged to report.
	COVID-19 risk may be higher for some colleagues who live in extended families	Support and advice is available from CQC's Race Equality Network
	There has been some evidence of a rise in hate crimes. Colleagues may face racism or discrimination which can cause anxiety and distress.	Contact for helplines /external support organisations will be included in the Employee Information pack and will be promoted through network intranet pages.
	 There has been some emerging evidence of higher rates of COVID 19 in BME communities. This could be due to several factors: - Structural and systemic inequalities Access to healthcare BME people more likely in low paid and front-line services as key workers 	PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support.
	 Language barriers Co-morbidities such as diabetes, high blood pressure 	Freedom to Speak up ambassadors available for staff to raise concerns.
		Public Health England have initiated an inquiry into disproportionate impact of COVID19
		NHS England and NHS Confederation will be providing guidance on risk assessing

		BME staff, which CQC will need to consider for our colleagues.
Gender	 Gender Profile Women 70% Men 30% Social distancing, working from home and COVID 19 may have a disproportionate impact on women for the following reasons: Women are more likely to be informal carers Women are more likely to be main carers for young children Women more likely to volunteer in the community and support neighbours Emotional support for children who may want this from their mothers The National Domestic Abuse helpline has seen a 25% increase in calls since the government lockdown social isolation measures were put in place. Women are the more likely to be victims of domestic abuse. 	The <u>CQC Employee Information Pack</u> has been produced and published on the intranet and included in daily internal engagement bulletins. The information pack is updated regularly which covers advice and guidance on School and Childcare closures. The guidance includes giving flexibility to colleagues to work their hours differently to enable a blended approach of working from home whilst looking after children. Support and advice available from CQC's Gender Equality Network Contact for helplines /external support organisations will be included in the Employee Information pack and will be promoted through network intranet pages. PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support Targeted communication on certain risks and signposting to support groups will be carried out.
Gender Reassignment	We do not have data on the number of Trans colleagues in the organisation as ESR does not capture this. Evidence suggests that Trans colleagues may not have large supportive social circles and can often be isolated from their families. Trans people are more likely to have mental health conditions and COVID 19 could potentially heighten anxiety and worry. Social distancing might have a higher impact for older trans people who rely on their external contacts for advocacy/ social networks COVID 19 may have an impact on hospital bed availability which may have an impact on hospital accommodation issues for trans people (e.g. availability of suitable bed space) Social distancing policies may have a higher impact for older trans people who have experienced discrimination, which may reinforce a sense of stigma.	Support and advice from CQC's LGBT+ Equality Network Contact for helplines /external support organisations will be included in the Employee Information pack and will be promoted through network intranet pages. Encourage open and supportive conversations with managers and managers to be sensitive to conversations and worries raised. PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support. Virtual health and wellbeing activities facilitated by the OD team and individual directorates.

Marriage &	People may have to delay their transitioning / treatment due to the virus which may cause anxiety/ distress. Trans people may have to isolate with family members who do not support their gender identity and may be subject to emotional or physical abuse as a result of this Trans people may have concerns around the medical care they may require during this time due to potential prejudice on the part of the caregivers. Possible higher risk for people who are in an abusive relationship and are unable to leave the house to escape their partners as part of the routine working day, together with heightened risk of abuse due to levels of stress.	Targeted communication on certain risks and signposting to support groups will be carried out.
Marriage & Civil Partnership	Anxiety if partners are separated due to isolation	Support from line managers. PAM assist Employee Assistance Programme includes a 24 hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support
Pregnancy & Maternity	Pregnant people are included in the list of 'high risk' groups. Not yet known if they can pass on COVID 19 to their child before or at birth. Extreme pressure on health services or staff shortages may have an impact on maternity services. Social distancing for pregnant women might have an impact on their ability to manage their own healthcare, including mental health For any colleagues going through the adoption process there may be increased emotional and mental impact if delays caused. Colleagues going through IVF may result in increased emotional and mental impact if delays caused.	The new <u>CQC Employee Information Pack</u> covers advice and guidance on pregnancy and maternity issues. The pack advises that in the event of surgeries/clinics being inundated with callers, colleagues may not be able to obtain a certificate of expected confinement (MATB1). Colleagues should therefore be asked to submit an application for Maternity Leave with the expected date of confinement being accepted. Support and advice from CQC's Gender Equality Network Contact for helplines /external support organisations will be included in the Employee Information pack and will be promoted through network intranet pages. Line managers having conversations with colleagues about worries and anxieties. Encourage managers to be open and

Religion & Belief	Religion- Christianity Religion- Hinduism Religion- Islam Religion- Judaism Religion- other Social distancing policies may have diffe impacts for people in different religious g particularly in relation to end of life care. example, where it is more important in so religions that the person sees either their family/ or a religious or spiritual leader/ o when they are nearing death. Not being a do this may cause heightened distress. Restrictions around visiting places of wor and celebrating key festivals in congrega may cause additional anxiety and distress colleagues.	roups, For ome fficial able to rship tion	 sensitive in understanding individual concerns. PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support Managers should consider to flexibility for staff to observe religious and spiritual requirements E.g. Ramadan Line managers having conversations with colleagues about any issues. Encourage managers to be open and sensitive in understanding any anxieties and worries. Support and advice from CQC's Race Equality Network has been promoted widely. Contact for helplines /external support organisations will be included in the Employee Information pack and will be promoted through network intranet pages. PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support Online activities to celebrate festivals and key events will be facilitated by the OD team. NHS Guidance on Ramadan and COVID 19 to be shared on the intranet.
Sexual Orientation	Sexual orientation profile		Support and advice from CQC's LGBT+ equality Network
	Heterosexual	77%	Contact for helplines /external support
	Gay, LGBT, Other, undecided	6% 17%	organisations will be included in the Employee Information pack and will be promoted through network intranet pages
	Don't know	17%	and the wellbeing newsletter.
	For some lesbian, gay, bi and trans peop risks of homelessness, insecure employr restricted access to healthcare and other inequalities may deepen. The <u>LGBT in B</u>	nent,	Line managers having conversations with colleagues about worries and anxieties.

	 Health Report by Stonewall shows us that LGBT people are at greater risk of marginalisation in time of crises Social distancing policies of external organisations/support groups might have a higher impact for LGB+ older people who rely on their external social networks for advocacy Social distancing policies of providers might have a higher impact for older LGB+ older people who have experienced discrimination, which may reinforce a sense of stigma Support organisations may be less likely to be running face to face services LGB+ people may have to isolate with family member/s who do not support their sexuality and may be subject to emotional or physical abuse as a result of this. LGB+ people may have concerns around how their relationship will be regarded if medical care/decision-making is required. 	Encourage managers to be open and sensitive in understanding individual concerns. PAM assist Employee Assistance Programme includes a 24-hour helpline to support staff is available for all colleagues to access. This also has COVID 19 specific support
General Comments across all equality strands	 Financial Impact Loss of income from partners may cause anxiety and worry Younger people earning less /single salary household so may be increased anxiety Planned retirement may be affected 	Raising awareness of financial support (PAM Assist Advice and Union support) Managers awareness of potential financial concerns – explore delivery of short awareness sessions Signposting to support services Union reps can give financial support
	 Fixed term contracts 3% of our colleagues are on fixed term contracts (as at Dec 19) Colleagues on fixed term contracts, which are due to end in the next few months, have raised issues of heightened anxiety and worry about future employment due to the difficulty in the current economy and job market. Wellbeing Due to the current situation we are facing, we understand the significant role of health and wellbeing of our colleagues and have therefore reflected social, physical, mental, emotional and financial needs across the whole of the EIA. Homeworking top tips have been 	Directorates to undertake a review of all fixed term contracts ending in the next 3 months, making decisions regarding extension on a case by case basis considering organisational requirements for the continuation of the role and the impact on individual's during this period of instability within the job market. Wherever possible we will work to offer extensions to current contracts however this may not be possible in all cases. Where this is not possible, we will work with individuals to explore available avenues to preserve their employment i.e. supporting colleagues to undertake external or internal secondments to alternative roles to provide for the situation to stabilise.

developed to support colleagues to consider mental and physical wellbeing as well as staying connected.	Encourage managers to consider continuity of employment earlier than usual due to potential delays in decision making.
Access to policies and further resources	
Mind – resources on <u>Corona Virus and</u> <u>Wellbeing</u>	
WHO - Coping with stress during the COVID outbreak	
Looking after your mental health	
Stonewall and COVID 19	
Autism and COVID19	
Domestic Abuse – how to get help	
Muslim Council Of Britain – COVID 19	
Maternity Action	
Money Advice Service	
CQC Employee Assistance Programme	
CQC's Wellbeing pages	
CQC's Equality Networks	
Surviving work with children (and others in the house) yammer group CQC	
Working parents yammer group CQC	
Trade Unions	
Clinically extremely vulnerable person support	

If the policy, project or programme changes the way that we deliver our functions, please complete section 7 - Human Rights duties assessment. You do not need to complete this section if the policy or document is internal-facing, e.g. a People policy – you can skip to section 8 – Action Planning.

7	a) Human Rights duties compliance	b) Mitigation
	Is the policy, document, project or programme likely to have human rights implications If so, is this impact likely to be positive or negative?	Consider: How will any potential positive impact on human rights be maximised? This helps us to meet our duty to fulfil human rights.

		How will only potential popotive import
	Consider:	How will any potential negative impact on human rights be mitigated?
	- The impact on CQC respecting	on numan nynts be mitiyateu :
	people's human rights could our	Note that there are differences in our
	actions directly affect people's rights?	duties depending on the rights concerned
	For example, by compromising their privacy	and whether the impact relates to respecting, protecting or fulfilling human
	privacy	rights.
	 If the proposals could affect rights 	5
	to privacy, a data protection impact assessment should be undertaken –	For example, the duty to respect the right
	http://intranetplus.cqc.local/Working for	to freedom from inhuman or degrading treatment is absolute. However, respecting
	CQC/LegalInfoManagement/Information	rights to privacy can be restricted if this is
	Management/Documents/Data Protection	lawful, for a legitimate aim and
	Impact Assessment process and form.docx	proportionate.
		Further advice is available form the
	- The impact on CQC protecting	Equality and Human Rights team
	people's human rights e.g. regulatory changes which impact on how we	equalityhumanrights@cqc.org.uk
	protect the human rights of people	oqualityrianianiigino e oqo.org.uk
	using services,	
	- The impact on CQC fulfilling	
	people's human rights, this relates to	
	helping people exercise their human	
	rights themselves, for example through	
	the provision of information about rights or promotion of advocacy	
Freedom from		
inhumane or	N/A	
degrading treatment		
treatment		
Diabéta		
Right to liberty	N/A	
-		
Right to	N/A	
respect for family and		
private life,		
home and		
corresponden ce (includes		
autonomy		
issues in		
care and treatment)		
Other rights,	N/A	
eg right to		
life, right not to be		
discriminated		
against in		
connection		
	1	

with other rights	

8. Action Planning – this should be completed whenever a differential equality impact or human rights impact has been identified

Action	Action Owner	Timescales	Date completed
Ensure all staff have the lone working app on their mobiles or can access via desktop	IT	April 2020	
Prioritise managers who are currently managing colleagues with mental health conditions to attend the mental health training	Academy	April 2020	
Equality Networks to provide links to support groups and external organisations for their members to access	Equality Networks	April 2020	
Fortnightly meetings with Equality network chairs and weekly meetings with Trade Unions to listen to concerns/issues from members so feedback can be given to People Development Management Team. This will also inform corporate messaging and communications	OD and HR	Weekly/Fortnightly until June 2020 and then review	Completed
Explore delivery of short awareness sessions on financial worries	OD Wellbeing	April 2020	
	OD	April 2020	Completed

Including useful links to employee resource pack and weekly bulletins			
Prioritising reasonable adjustments for homeworking	HR	March /April 2020	Completed
Wellbeing newsletter to include links to support groups and organisations	OD	April 2020	Completed
Raise awareness of financial support (PAM Assist Advice and Union support)	OD	April 2020	
Encourage managers to consider continuity of employment earlier than usual due to potential delays in decision making and explore options	HR to advise managers	April 2020	Ongoing
Directorates to undertake a review of all fixed term contracts ending in the next 3 months and begin to make decisions regarding extension on a case by case basis.	Individual Directorates	April 2020	
Encouraging all colleagues to have conversations with their line manager about their specific circumstances and any additional pressures they may currently be facing.	HR to include in Employee Information Pack Include in briefing calls by Ian Trenholm	March 2020	Completed

8. EIA Sign-Off	If your EIA relates to CQC workforce equality, Your completed EIA should be sent to Safina Nadeem Diversity & Inclusion Manager for approval:-
	safina.nadeem@cqc.org.uk

All EIAs must be sent to Lucy Wilkinson, Equality, Diversity and Human Rights manager for final sign off. Lucy.wilkinson@cqc.org.uk

Note that after sign off, EIAs will be published on the intranet (internally facing issues) or internet (externally facing issues), so should be written with that in mind, for example in relation to person identifiable information.