

Managing Concerns against People in a Position of Trust (PIPOT) (N-004)

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Executive Lead (name & job title):	Hilary Gledhill, Executive Director of Nursing, Allied Health and Social Care Professionals
Name of approving body:	Quality and Patient Safety Group (QPaS)
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<i>Minor amendments made prior to full review date above (see appended document control sheet for details)</i>	
<i>Date approved by Lead Director:</i>	<i>QPaS – 22 February 2024</i>
<i>Date EMT as approving body notified for information:</i>	<i>March 2024</i>

Policies should be accessed via the Trust intranet to ensure the current version is used

Contents

1. Introduction	3
2. Scope	4
3. Duties and Responsibilities	5
3.1. Staff	5
3.2. Line Managers	5
3.3. Human Resources Professionals	5
3.4. The Humber Safeguarding Team	6
3.5. The PIPOT Lead	6
3.6. The Local Authority	6
4. Information Sharing/Confidentiality and Record Keeping	6
5. Record Keeping	7
6. Procedures relating to the policy	7
6.1. Reporting a concern or allegation	7
6.2. The PIPOT meeting	8
6.3. Concluding a PIPOT process	8
6.4. Lessons Learned	9
6.5. Support for the individual whom an allegation has been made against	9
7. Allegations against others not employed by the Trust	10
Appendix 1 – PIPOT Decision Making Tool	11
Appendix 2- PIPOT Referral Form	12
Appendix 3 – PIPOT Meeting Record of Discussion	13
Appendix 4 – PIPOT One Page Guide	15
Appendix 5 – Document Control Sheet	16
Appendix 6 – Equality Impact Assessment (EIA) Toolkit	18

1. Introduction

This policy provides the framework for managing concerns where allegations have been made against a Person in a Position of Trust (PIPOT) that indicate a child or adult at risk of abuse or neglect are believed to have suffered, or are likely to suffer, significant harm. This may include allegations concerning individuals working for or on behalf of Humber Teaching NHS Foundation Trust.

All individuals working in or on behalf of the Trust have a commitment to protect children and adults at risk. Safeguarding children and adults is underpinned by the Children Act 1989, Section 11 of the Children Act 2004, and The Care Act 2014. In addition, the Local Safeguarding Children and Safeguarding Adults Partnerships and Boards have their own policies in place and provide guidance in relation to safeguarding children and safeguarding adults where allegations are made against individuals considered to be a person in a position of trust.

The Trust recognises the need to have a clear process in place to manage allegations. To ensure safe working systems are in place for staff working with children and adults, this policy should be read alongside other policies such as:

- [Safeguarding Adults Policy](#)
- [Safeguarding Children Policy](#)
- [Safeguarding Domestic Abuse and Violence Policy](#)
- [Disciplinary Policy](#)
- [Recruitment and Selection Policy](#)

This policy also reflects the requirements of the Care Quality Commission (CQC) Regulations as per the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

The purpose of this policy is to:

- Set out clear reporting requirements and the arrangements for the management of allegations against persons in positions of trust, with concise recording, information sharing arrangements and explicit timescales for action.
- Ensure that allegations are dealt with in a fair, proportionate and transparent way, adopting the [NHS Just Culture](#) principles.
- Ensure that appropriate systems are in place to support and provide regular updates to the employee concerned in respect of any investigation.
- Ensure that the control of information in respect of individual cases is in accordance with data protection and confidentiality requirements in line with the General Data Protection Regulation (GDPR).
- Ensure that where staff, students and volunteers are found to have had allegations substantiated against them, appropriate governance procedures are followed, including a referral to the individual's Professional Body, the Disclosure and Barring Service (DBS), the Local Authority and the Police, where appropriate.

This guidance must be applied when concerns are raised about a person in a position of trust in a work (professional) context and also if any relevant concerns arise from a person's personal life, if there are implications for the safety of people with care and support needs. This guidance applies whether the allegation or concern is current or historical.

When considering a referral relating to a person in a position of trust, a distinction should be made between an allegation, a concern about a person's quality of care/practice and a complaint. Where there are potential risks to children or adults with care and support needs

who use the Trust's services, these risks need to be assessed and action taken to safeguard the child or adult.

Examples of concerns that can arise either in a professional or personal context:

- Person has behaved in a way that has harmed or may have harmed an adult or child.
- Person has committed a criminal offence against, or related to, an adult or child.
- Person has behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs.
- Person may be subject to an investigation by police as a perpetrator of domestic harm.
- A person has behaved (or is alleged to have behaved) towards children in a way that indicates that they may pose a risk of harm to adults with care and support needs.
- A person is subject of a formal safeguarding enquiry into allegations of abuse or neglect which have occurred in one setting. However, there are also concerns that the person is employed, volunteers or is a student in another setting where there are adults with care and support needs who may also be at risk of harm.

2. Scope

This policy applies to allegations where there is reasonable cause to suspect that a child (anyone under 18 years of age) or an adult at risk is suffering, or is likely to suffer, significant harm. It also applies to cases where allegations are made that indicate that a person is unsuitable to work with children and young people and adults at risk in their current role, or in any capacity.

This policy should therefore be used in respect of all cases in which it is alleged that a person working within the Trust poses such a risk. This policy applies to **all** Trust staff, and anyone working on behalf of, or undertaking work for, or volunteering for, Humber Teaching NHS Foundation Trust. This includes staff in substantive posts, bank posts, voluntary roles, student roles and individuals carrying out work on behalf of the Trust such as agency workers and contractors.

For ease of reference, all employees and workers who fall into these groups are referred to as 'individuals' in this document.

What is excluded from the policy?

Section 14 of Care Act and support statutory guidance states safeguarding is not a substitute for:

- The providers responsibility to provide safe and high-quality care and support.
- The commissioners regularly assuring themselves of the safety and effectiveness of commissioned services.
- The Care Quality Commission to ensure providers comply with the standards of care or by taking enforcement action.
- The core duties of the police to prevent and detect crime, and protect life and property.

Therefore, careful consideration should be given to distinguish clearly between:

- A complaint about a professional or volunteer.
- Concerns raised about the quality of practice provided by a person in a position of trust that do not meet the criteria for a safeguarding enquiry.

Other relevant bodies and their procedures should be used to recognise, respond to and resolve these issues.

3. Duties and Responsibilities

3.1. Staff

Individuals in the Trust are responsible for conducting themselves in a professional manner at all times to patients, relatives, colleagues and any other individuals they may come into contact with during the course of their work for the Trust.

Any individual with knowledge or information that a person is involved in the actual or potential harm or abuse of an adult or a child, whether in the course of their work, or personal time, (which could include as part of their family /carer responsibilities) must report it to their line manager, the Human Resource team and the Safeguarding Team. For professional staff this duty will also fall under their professional code of conduct. It should be noted that failure to report concerns could indicate collusion; along with malicious allegations, this would be viewed seriously by the Trust.

If a concern is raised out of hours advice should be sought from the on call manager and immediate action taken to safeguard any children or adults at risk of harm.

3.2. Line Managers

Line managers are responsible for ensuring that:

- There is consideration given to any immediate safeguarding concerns identified and these are responded to accordingly.
- The individual, whether subject to an allegation, or the person making an allegation, is treated in a fair, equitable and consistent manner in line with the relevant policies and procedures.
- The appropriate procedures are instigated and properly followed.
- Relevant information is provided for the investigation including details of any previous concerns.
- Support is provided to all individuals involved with the allegation.
- Ensuring that other relevant Trust services such as Human Resources and the Safeguarding Team are made aware of the allegation.

Line managers are responsible for completing the PIPOT Referral form and gathering all relevant information prior to the PIPOT meeting. This could include information about previous concerns. Line managers of an individual subject to a concern or allegation will be responsible for notifying and supporting the individual.

If a concern is raised out of hours advice should be sought from the on call manager and action taken accordingly.

3.3. Human Resources Professionals

The Workforce and Organisational Development directorate offers advice and support to managers as appropriate, and are responsible for:

- Advising managers and those involved in the PIPOT process of the requirements in relation to formal policies and processes, including disciplinary action and suspension or restricted practice.
- ensuring details of the allegation and any outcomes of internal investigations are recorded accurately and fairly in the relevant personal file.
- if required, ensuring that notification has been made to the relevant professional body, regulatory authority or DBS as necessary.

3.4. The Humber Safeguarding Team

On being notified of a concern involving a person in position of Trust working for, or on behalf of, the Trust, the safeguarding team will:

- Consider if the adult or child who is subject of the concern is at risk of immediate harm and if so ensure steps are taken to safeguard that person.
- Assess the concern/incident against the PIPOT decision making tool and advise the line manager to complete the PIPOT referral form (if not complete already)
- Organise a PIPOT meeting as soon as practically possible.
- Inform other relevant agencies such as Local Authority Designated Officer (LADO) or Safeguarding Adults Team.

3.5. The PIPOT Lead

The lead for PIPOT meetings will be either the Named Professional for Adult Safeguarding or Named Nurse for Safeguarding Children depending on the risk identified. This role may also be delegated to a Specialist Safeguarding Practitioner. Responsibilities include:

- Chairing the PIPOT meeting.
- Ensuring appropriate professionals are in attendance at the PIPOT meeting – this could be Division, Human Resources, as well as Communications if the concern is in the public domain.
- Delegating actions to be undertaken as a result of the meeting.
- Escalating to the Director and Deputy Director of Nursing, Allied Health & Social Care Professionals.
- Deciding whether a referral or concern should be submitted to the LADO or Safeguarding Adults Team.
- Deciding whether the Police need to be informed of the allegation.
- Maintain an accurate record of the allegation, PIPOT meeting and outcome.

3.6. The Local Authority

The Local Authority holds overall responsibility for oversight of the procedures for dealing with allegations about people who work with children and adults at risk of harm or abuse. Humber Teaching NHS Foundation Trust covers three Local Authorities; Hull, East Riding and North Yorkshire:

- For allegations against individuals working with children, the Local Authority Designated Officer (LADO) where the individual works should be contacted
- For allegations against individuals working with adults, the Local Authority Safeguarding Adults Team where the abuse occurred should be contacted

4. Information Sharing/Confidentiality and Record Keeping

Information Sharing/Confidentiality

Information sharing should comply with the Trusts Information Governance Policy, in that it should be fair and lawful, but the legislation and policy should not be a barrier to sharing information where a failure to do so would cause the safety of a child or adult to be at risk.

Matters relating to this policy should not be discussed outside of the process.

5. Record Keeping

A PIPOT referral form should be fully completed and submitted to the Safeguarding Team, for consideration of a PIPOT meeting being required. This form should contain any relevant information gathered by the line manager.

Where a PIPOT meeting takes place, a record of this and any supporting documentation will be kept in a confidential file on the safeguarding V Drive.

All records will be kept in accordance with the Trusts Record Keeping Guidelines.

6. Procedures relating to the policy

Concerns about an individual's behaviour may be identified by the following people/procedures:

- Police intervention or;
- Providers alerting commissioners investigation of services.
- Whistleblowing/Freedom to Speak Up disclosure.
- Commissioner's contract.
- Safeguarding adults enquiry.
- Safeguarding children investigation.
- The Care Quality Commission
- Complaints
- Reports from members of the public
- Incidents witnessed by members of staff or patients

6.1. Reporting a concern or allegation

If a person in a position of trust is alleged to have abused or harmed an adult with care and support needs, or who may pose a risk of abuse to an adult with care and support needs, it is essential that the concerns are appropriately reported and responded to in accordance with the local Safeguarding Adults Board and Safeguarding Children Partnership procedures.

Once the allegation has been reported it is important that the welfare and safety of adults (and children) is paramount, however, the Trust should ensure that any staff member who has had an allegation made against them are treated proportionately, fairly and are provided with appropriate support. They should be kept fully informed of the progress of the process.

Line managers are responsible for completing the PIPOT form (Appendix 2) and gathering all relevant information prior to the PIPOT meeting. If a concern is raised out of hours advice should be sought from the on call manager and action taken accordingly. The PIPOT form should detail the allegation and immediate action taken where an immediate risk to a child or adult has been identified, it should also detail any relevant information about the individual such as previous concerns raised and who the Divisional Representative and Human Resource Representative is for that particular concern.

This form is to submitted to the Trust Safeguarding Team to determine whether the criteria for a PIPOT meeting has been met in accordance with the decision making tool (Appendix 1). If a PIPOT meeting is required the Safeguarding Team will arrange this to take place as soon as practically possible following the allegation being made.

If out of hours, the matter should be escalated to the on call manager.

This process should not delay any action required to be taken to safeguard a child or adult from harm.

6.2. The PIPOT meeting

See Appendix 3 for the PIPOT meeting agenda and record of discussion.

Staff involved should be:

- Named Professional for Adult Safeguarding, Named Nurse for Safeguarding Children or delegated Specialist Safeguarding Practitioner (Chair).
- Division Representative.
- Human Resources Representative.
- Alleged individual's line manager.
- Administrative support for arranging of meetings and minutes.
- Communications Team (if allegation is in public arena).
- Any other relevant areas as decided by Chair.

The purpose of the meeting is to:

- Review details of allegation.
- Assess and manage any identified risks.
- Identify any immediate actions required which may include referral to:
 - LADO
 - Safeguarding Adults Team
 - Police
 - Professional bodies such as Social Work England, Nursing & Midwifery Council, Health & Social Care Professions Council or General Medical Council – others as appropriate
 - Regulatory bodies such as the Care Quality Commission.
- Agree actions to be taken with delegated responsibilities and a clear time frame.
- Determine the need for any redeployment or suspension of individual in line with Trusts Disciplinary Policy.

A record of the meeting will be shared and stored securely on the V drive.

6.3. Concluding a PIPOT process

A PIPOT meeting will reconvene following the conclusion of any open investigation as a result of the allegation. Recommendations will be made in respect of any further actions associated with the individual subject to the allegation, which may include:

- No Further Action
- Referral to a Professional Body
- Referral to the Disclosure & Barring Service
- Informing involved partner agencies
- Informing employer where allegation relates to someone acting on behalf of Trust but not directly employed, or individual has more than one employer
- Informing the service user or patient where they have been involved
- Actions associated with individual's conduct such as additional training, personal responsibility plan, supervision, workplace risk assessment etc

If the individual is removed by either being dismissed or permanently redeployed to a non-regulated activity because they pose a risk of harm to adults with care and support needs, the employer has a legal duty to refer the person to the Disclosure and Barring Service (DBS). In addition, where appropriate, employers should report workers to the statutory and

other bodies responsible for professional regulation such as the General Medical Council and the Nursing and Midwifery Council. The individual must be informed of any action undertaken against them. If a person subject to a PIPOT process attempts to leave their employment by resigning in an effort to avoid the investigation or disciplinary process, the employer is entitled not to accept that resignation, conclude whatever process has been utilised and, if the outcome warrants it, dismiss the employee or volunteer instead. This would also be the case where the person intends to take up legitimate employment or a course of study. A referral to DBS must be made if it is not possible to complete the disciplinary process.

The PIPOT meeting agenda and record of discussion will be updated to reflect the outcome and closure of case. This should be shared with:

- Any LADO or Safeguarding Adults Team involved
- Director and Deputy Director of Nursing, Allied Health and Social Care Professionals
- Human Resources
- Divisional Manager

This record will be strictly confidential and must not be shared outside of those listed above without the authorisation of the Director or Deputy Director of Nursing, Allied Health and Social Care Professionals.

6.4. Lessons Learned

The PIPOT meeting Chair will ensure any key themes and lessons learned are shared and embedded into practice via ongoing training, supervision and sharing across groups across the Trust via 7 minute briefings, practice notes.

6.5. Support for the individual whom an allegation has been made against

Alongside the Trust's duty of care towards any individuals who are (potentially) at risk, the Trust has a duty of care to the employee against whom the allegation has been brought. Support should be provided to minimise any potential stress associated with the process, which could usually include:

- Supporting the individual to understand the procedures being followed and any investigations being carried out
- Providing updates on developments of any procedures/investigations
- Giving the individual an opportunity to respond to allegations/concerns
- Supporting the individual to raise questions or concerns about their circumstances
- Referring the individual to Occupational Health
- Advising the individual that he/she may wish to seek support from their Union or Professional Body, or independent advice. It should be noted that in some cases, limited information may only be able to be shared in order not to prejudice any enquiry, investigation or place anyone at risk.

Care should be taken when discussing the allegation with the individual subject to the allegation, and agreement sought from the PIPOT meeting Chair beforehand so not to impede any potential investigation e.g. Police.

7. Allegations against others not employed by the Trust

If an allegation is made against an individual who is not employed or acting on behalf of the Trust, this process does not apply, however an individuals responsibility to raise a concern in line with Local Authority Safeguarding Adult Boards and Children Partnerships remains, therefore the following action should be taken:

- Discussion with Trust Safeguarding Team
- Possible referral to LADO where allegation relates to children
- Possible adult concern form to Safeguarding Adults Team where allegation relates to adults

Appendix 1 – PIPOT Decision Making Tool

Decision Making Tool for Trust PIPOT Meeting

Consider	No concern	Concerns
Has the person behaved in a way that has harmed or may have harmed a child, young person or adult with care and support needs?	No concerns of harm or potential harm	Some concerns of potential harm, harm or serious harm
Has the individual possibly committed a criminal offence against, or related to a child, young person or adult with care and support needs?	No	Yes, or No harm towards a child, young person or adult with care and support needs but a crime has been committed
Has the individual behaved (or alleged to have behaved) in a way that indicates they may be unsuitable to work or volunteer with a child, young person or adult with care and support needs?	No	Yes
Has the individual behaved in a way which questions their ability to provide a service to children, young people or adults with care and support needs either at a place or work or volunteering?	No	Yes
	PIPOT meeting not required	Any of above would indicate a PIPOT meeting is required

Appendix 2- PIPOT Referral Form

[PIPOT Referral Form](#)

Appendix 3 – PIPOT Meeting Record of Discussion

Humber Teaching NHS Foundation Trust PIPOT Meeting

Record of Discussion

For a meeting to be held on DATE, TIME, VENUE																													
1.	Attendees and apologies (please state who is chair)																												
2.	Any conflicts of Interest																												
3.	Confidentiality Information shared within this meeting is strictly confidential and is shared in accordance with legislation, guidance and policy. Copies of this record of discussion should be held securely and not shared without prior permission of the Chair.																												
4.	Review of previous record of discussion and actions (if applicable)																												
5.	Details of the allegation(s)																												
6.	Actions taken to manage risk/alleged risk including																												
7.	Referrals/Reports to: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;"></th> <th style="width: 20%;">Yes/No</th> <th style="width: 20%;">Details (log number etc)</th> </tr> </thead> <tbody> <tr> <td>Police</td> <td></td> <td></td> </tr> <tr> <td>Safeguarding Childrens</td> <td></td> <td></td> </tr> <tr> <td>Safeguarding Adults</td> <td></td> <td></td> </tr> <tr> <td>LADO</td> <td></td> <td></td> </tr> <tr> <td>PIPOT</td> <td></td> <td></td> </tr> <tr> <td>DBS</td> <td></td> <td></td> </tr> <tr> <td>Professional or Regulatory Body</td> <td></td> <td></td> </tr> <tr> <td>Secondary employment/agencies</td> <td></td> <td></td> </tr> </tbody> </table>			Yes/No	Details (log number etc)	Police			Safeguarding Childrens			Safeguarding Adults			LADO			PIPOT			DBS			Professional or Regulatory Body			Secondary employment/agencies		
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DBS																													
Professional or Regulatory Body																													
Secondary employment/agencies																													
8.	Discussion																												

9.	Actions				
	Action	Responsible Person	Date due		
1					
2					
3					
4					
5					
10.	Outcome				
	Yes		No		
Further meeting required	Yes		No		
Closure of PIPOT	Yes		No		
10	Date, Time and Venue of Next Meeting (if applicable) DAY, DATE, TIME, VENUE				

Appendix 4 – PIPOT One Page Guide

Managing Concerns against People in Position of Trust (PIPOT) One Page Guide

What does the policy cover?

The policy provides the framework for managing concerns where allegations have been made against a person in position of trust that indicate a child or adult at risk of abuse or neglect are believed to have suffered, or are likely to suffer, significant harm.

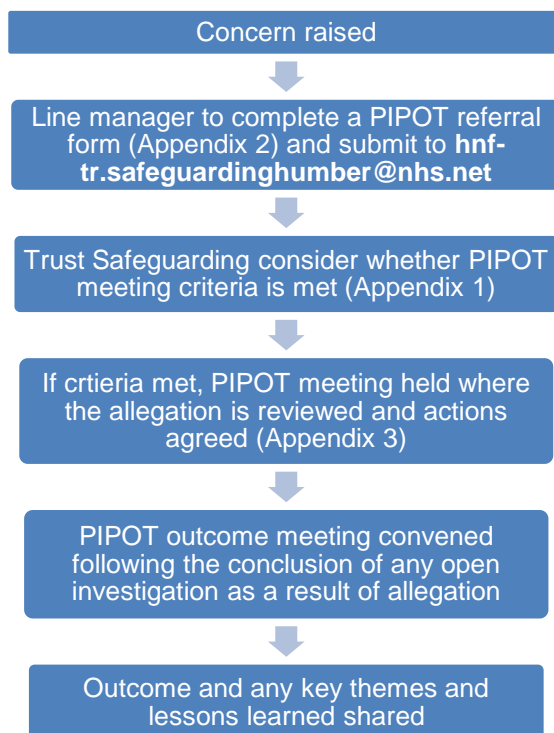
What does a PIPOT allegation relate to?

A person in position of trust who has:

- Behaved in a way that has harmed or may have harmed an adult or child
- Committed or possibly committed a criminal offence against or related to an adult or child
- Behaved towards an adult or child in a way that indicates they may pose a risk of harm to adults with care and support needs or children

This applies where concerns are raised about a person in a position of trust in a work (professional) context and also if any relevant concerns arise from a person's personal life, if there are implications for the safety of people with care and support needs. This guidance applies whether the allegation or concern is current or historical.

Summary of process



Appendix 5 – Document Control Sheet

This document control sheet, when presented to an approving committee must be completed in full to provide assurance to the approving committee.

Document Type	Policy – Managing Concerns Against Individuals in a Position of Trust (N-004)		
Document Purpose	Humber Teaching NHS Foundation Trust recognises the need to be clear, fair and straightforward in its dealings with all employees. This policy, procedure and guidance is to help ensure that any relevant allegations will be handled in such a way that a suitable balance will be made between the overriding need to protect children and adults at risk and treat employees in a fair and equitable manner whilst complying with legislation and statutory guidance.		
Consultation/ Peer Review:	Date:	Group / Individual	
<i>list in right hand columns consultation groups and dates -</i>	September 2020	Human Resources Safeguarding Team Division Leads East Riding LADO and Hull LADO Clinical Staff Practice Education Team	
	November 2020	QPAS	
Approving Body:	QPAS	Date of Approval:	22/02/2024
Ratified at:		Date of Ratification:	
Training Needs Analysis: <i>(please indicate training required and the timescale for providing assurance to the approving committee that this has been delivered)</i>		Financial Resource Impact	
Equality Impact Assessment undertaken?	Yes [X]	No []	N/A [] Rationale:
Publication and Dissemination	Intranet [X]	Internet []	Staff Email []
Master version held by:	Author []	HealthAssure [X]	
Implementation:	<i>Describe implementation plans below - to be delivered by the Author:</i>		
	<ul style="list-style-type: none"> Dissemination to staff via global email Teams responsible for ensuring policy read and understood 		
Monitoring and Compliance:	<p>The LADO/Local Authority will report regularly to the Trust Named Nurse/Professional:</p> <ul style="list-style-type: none"> any instances where the Trust has failed to deal with an allegation in accordance with the Trust or East Riding of Yorkshire/Hull/North Yorkshire Safeguarding Children Partnership/Safeguarding Adult Board Allegations Against Staff Procedures; any concerns regarding interagency working in respect to an allegation against an individual <p>An Annual Report is provided by the LADO to the relevant Safeguarding Children and Adult Partnerships which includes activity, outcome and performance detail, as well as quarterly assurance meeting with the Designated Adult and Child Professionals/Nurses of the ICB.</p>		

Document Change History:			
Version Number / Name of procedural document this supersedes	Type of Change i.e. Review / Legislation	Date	Details of Change and approving group or Executive Lead (if done outside of the formal revision process)
1.00	New Policy	November 2010	New policy ratified
1.02	Review	November 2011	Minor amendments
1.03	Review	March 2013	Minor amendments
2.00	Review	July 2017	Reviewed – major changes reflect requirements of managing safeguarding allegations against staff (NHS England 2015) Contact details (appendix 4) updated Policy title updated and word Children's removed to include all population

3.00	Review	November 2020	Reviewed - minor amendments Title change Staff title changes Incorporated all individuals who work for or on behalf of the Trust Contact details updated
3.01	Review	January 2024	Reviewed. Title changed. Changed to include PIPOT referral, meetings and decision making tool Roles and responsibilities reviewed Approved at QPaS (22 February 2024).

Appendix 6 – Equality Impact Assessment (EIA) Toolkit

For strategies, policies, procedures, processes, guidelines, protocols, tenders, services

1. Document or Process or Service Name: **Managing Concerns against People in a Position of Trust (PIPOT)**
2. EIA Reviewer (name, job title, base and contact details): **Rosie O’Connell, Head of Safeguarding and Named Professional for Adult Safeguarding**
3. Is it a **Policy**, Strategy, Procedure, Process, Tender, Service or Other? **Policy**

Main Aims of the Document, Process or Service		
To set out the requirements that must be met for approval, ratification and dissemination of all Humber Teaching FT policies.		
Please indicate in the table that follows whether the document or process has the potential to impact adversely, intentionally or unwittingly on the equality target groups contained in the pro forma		
Equality Target Group	Is the document or process likely to have a potential or actual differential impact with regards to the equality target groups listed?	How have you arrived at the equality impact score?
Age	Equality Impact Score Low = Little or No evidence or concern (Green) Medium = some evidence or concern (Amber) High = significant evidence or concern (Red)	1. who have you consulted with 2. what have they said 3. what information or data have you used 4. where are the gaps in your analysis 5. how will your document/process or service promote equality and diversity good practice
Disability		
Sex		
Marriage/Civil Partnership		
Pregnancy/Maternity		
Race		
Religion/Belief		
Sexual Orientation		
Gender re-assignment		

Equality Target Group	Definitions	Equality Impact Score	Evidence to support Equality Impact Score
Age	Including specific ages and age groups: Older people, Young people, Children, Early years	Low	See summary.
Disability	Where the impairment has a substantial and long term adverse effect on the ability of the person to carry out their day to day activities: Sensory, Physical, Learning, Mental Health (and including cancer, HIV, multiple sclerosis)	Low	See summary.
Sex	Men/Male, Women/Female	Low	See summary.
Married/Civil Partnership		Low	See summary.
Pregnancy/ Maternity		Low	See summary.
Race	Colour, Nationality, Ethnic/national origins	Low	See summary.
Religion or Belief	All Religions Including lack of religion or belief and where belief includes any religious or philosophical belief	Low	See summary.
Sexual Orientation	Lesbian, Gay Men, Bisexual	Low	See summary.
Gender re-assignment	Where people are proposing to undergo, or have undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attribute of sex	Low	See summary.

Summary

<i>Please describe the main points/actions arising from your assessment that supports your decision above</i>			
This policy is applied equally to all staff and persons who may be victims or sources of harm or abuse. There is no adverse impact on a particular equality target group listed above.			
EIA Reviewer	Rosie O’Connell		
Date completed;	January 2024	Signature	R O’Connell