

Bullying and Harassment Policy

**NHS West Essex Clinical Commissioning Group Policy Reference
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DOCUMENT CONTROL SHEET

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Version	Date	Reviewer(s)	Revision Description
V1.0		Hannah Preston HR Business Partner.	Adapted for use as the Shared Service Policy.

Implementation Plan:

Development and Consultation	Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.
Dissemination	This policy will communicate to staff representatives. It will be communicated electronically to all staff and managers and will be published on the CCG's intranet. The CCG has signed up to the Social Partnership Forum's Call to Action on bullying and is proactively promoting this policy and the CCG's anti-bullying stance. The CCG is exploring the nature and incidence of bullying and developing robust action plans to tackle bullying and creating a positive culture.
Training	HR Masterclasses will be made available to all managers on Bullying and Harassment. Managers will also be able to access advice from the HR and ODL Shared Service on the implementation and interpretation of this policy.
Monitoring and Review	All complaints of bullying & harassment are recorded by the HR and ODL Shared Service and activity is reported on at least annually, together with a breakdown of policy application across the protected characteristics under the Equality Act. The data identified from monitoring will be used to update the policy and ensure best practice as necessary.
Equality and Diversity	17.05.2017 Equality Impact Assessment.
Associated Documents	<ul style="list-style-type: none"> ▪ Disciplinary Procedure ▪ Grievance Procedure ▪ Relevant Professional Standards

References	▪ The Equality Act 2010
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Document Status:

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1.0 Introduction

- 1.1 NHS Bedfordshire, NHS East and North Hertfordshire, NHS Herts Valleys, NHS West Essex and NHS Luton Clinical Commissioning Groups (respectively referred to as 'the CCG') aims to provide a happy and fulfilling environment in which to work. This policy promotes the respectful treatment of all employees within the CCG and the protection of employees from bullying and harassment at work.
- 1.2 All employees of the CCG are responsible for helping to ensure that individuals do not suffer any form of bullying or harassment and they are encouraged and supported in any legitimate complaint. Every individual will be accountable for the operation of this policy, as they carry responsibility for their own behaviour and actions on or off site.

2.0 Scope

- 2.1 This policy applies to all employees of the CCG. For the purposes of this policy, the scope includes office holders, employees on honorary contracts, and those employed on a joint contract with the CCG and another employer.
- 2.2 This policy may apply to incidents or activities outside of the normal working day and to both "official" and "unofficial" social activities. These may be deemed to be an extension of the workplace. The CCG may have a duty of care in respect of such matters and will investigate all complaints of inappropriate or improper conduct whether they are alleged to have occurred in or outside the workplace.

3.0 Definitions

- 3.1 **Bullying** - Unacceptable behaviour as perceived by the employee, which subjects the individual or group to unwelcome attention, intimidation, humiliation or ridicule or violation of an individual's dignity. Furthermore, offensive, abusive, or insulting behaviour, abuse of power or unfair sanctions which makes the recipient feel upset, threatened or vulnerable. Including deliberately undermining a competent employee, for example, by imposing unreasonable workloads or frequent unjustified criticism. Further examples of unacceptable behaviour covered by this policy are set out in Appendix 2.

3.2 **Direct Discrimination** – this occurs when a person or group is treated less favourably than others are or would be treated in the same or similar circumstances.

3.3 **Harassment** - Harassment is defined as any conduct which is;

- unwanted by the recipient;
- is considered objectionable by the recipient;
- causes humiliation, intimidation, offence or distress (or other detrimental effect);
- or when a third party is witness to any of the above and finds this intimidating or offensive.

The key to distinguishing between what does and does not constitute harassment is that harassment is behaviour that is unwanted by the person to whom it is directed.

It is the impact of the conduct and not the intent of the perpetrator that matters.

Harassment may be an isolated occurrence or repetitive: it may occur against one or more individuals. Harassment may be, but is not limited to:

- Physical contact – ranging from touching to serious assault, gestures, intimidation, aggressive behaviour.
- Verbal – unwelcome remarks, suggestions and propositions, malicious gossip, jokes and banter, offensive language.
- Non-verbal – offensive literature or pictures, graffiti and computer imagery, isolation or non-co-operation and exclusion or isolation from social activities.
- Unwanted conduct related to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Under the Equality Act, harassment is unwanted conduct which is related to one of the following: age, disability, gender reassignment, race, religion or belief, sex and sexual orientation and is therefore unlawful. This includes harassment of a sexual nature and is specifically outlawed by the Equality Act. An individual does not need to possess the relevant characteristic themselves and therefore harassment can be because of their association with a person who has a protected characteristic, or because they are wrongly perceived to have one, or are treated as if they do.

- 3.4 **Indirect Discrimination** – this occurs when an apparently neutral provision or criteria has an adverse impact on someone due to their having one or more of the protected characteristics. It is possible to justify indirect discrimination but this has to be done on sound, objective grounds, having shown that all possible measures have been taken to lessen the discriminatory effect.
- 3.5 **Mediation** - Mediation is a process whereby a neutral third party intervenes in a workplace conflict or dispute to assist the parties in reaching a satisfactory outcome.
- 3.6 **Protected Characteristic** - A characteristic shared by a group of people that are protected from discrimination under the provisions of the Equality Act 2010, which are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race (including colour, nationality, and ethnic or national origin); religion or belief; sex (gender); and sexual orientation. Our Equality and Diversity Policy also includes trade union membership, offending background, domestic circumstances, social and employment status, HIV status, political affiliation, career status and socio-economic background.
- 3.7 **Victimisation** - Where an employee is subjected to a detriment because they have, in good faith, raised a concern or complained, be it formally or informally, that they have been bullied or harassed, or supported someone to raise a concern or complaint or given evidence in relation to a complaint. Discrimination by victimisation is unlawful. A person is victimised, for example, if they are given less favourable treatment than others in the same circumstances, because it is suspected or known that they have brought proceedings under the Equality Act or given evidence or information relating to such proceedings or alleged that discrimination has occurred. Discrimination against an individual, who has brought or contemplated bring an action or made a complaint or given information alleging discrimination or has appeared as a witness, is also forbidden

4.0 Policy Statement

The CCG is committed to creating a work environment free of harassment, bullying, victimisation and discrimination for all employees, where everyone is treated with dignity and respect and protected from harassment, victimisation, discrimination and bullying at work.

To this end, the CCG has signed up to the Social Partnership Forum 'collective call to action' to tackle bullying in the NHS and create a positive culture.

The CCG believes that harassment, victimisation, discrimination and bullying at work in any form is completely unacceptable and will not be tolerated. All such allegations will be investigated and, if appropriate, disciplinary action will be taken.

The CCG will not tolerate victimisation or intimidation of a person raising concerns under this policy or for supporting someone to make such a complaint.

The CCG will take such steps as are necessary to achieve these aims.

5.0 Responsibilities

5.1 Line Managers are expected to:

- Familiarise themselves with the content of this document and fairly and consistently apply the policy.
- Seek to prevent any infringement of this policy by employees in their team and ensure all team members are aware of the content of this policy and what is acceptable and what is not acceptable behaviour at work and that harassment is a disciplinary offence.
- Ensure a supportive working environment.
- To take prompt action to prevent and stop harassment by using this policy.
- Attend appropriate training and seek guidance from Human Resources in the application of this policy.
- Deal with any informal or formal complaints under this policy in a timely and sensitive manner, seeking guidance as appropriate from their HR Business Partner.
- Promote a culture where inappropriate behaviours are discouraged and acted on, empowering staff to appropriately challenge.

5.2 Employees are expected to:

- Familiarise themselves with the content of this document.
- Be aware of the affect their behaviour may have on others around them.
- Treat colleagues with respect and dignity.
- Use the formal procedure responsibly and in good faith.
- Assist in an investigation, if asked to provide witness evidence.

- Report infringements of this policy and act in a manner consistent with this policy.

5.3 Human Resources Responsibilities:

- Maintain and update the Bullying and Harassment Policy to ensure it is in line with organisational and legislative changes.
- Provide advice and support to line managers and employees on the application of policy and guidance.

6.0 Informal Resolution

- 6.1 People may not be aware that their behaviour is unwelcome or there may be a misperception or genuine misunderstanding in some cases. Often an informal discussion can lead to greater understanding and agreement that the behaviour will cease.
- 6.2 Complainants are therefore encouraged, if they feel able, to resolve the problem informally by making it clear to the alleged perpetrator that their actions are unwanted and should not be repeated. This may be done verbally or in writing in which case the complainant should keep a copy of the documentation and, where possible, the times and dates of incidents should be recorded.
- 6.3 If the complainant feels unable to approach the alleged perpetrator, their manager (or next in line manager if the concerns relate to the direct line manager) could be asked to speak to the alleged perpetrator on the complainant's behalf. A note should be made of the action taken.
- 6.4 An individual who is made aware that their behaviour is unacceptable should:-
- Listen carefully to the complaints and the particular concerns raised;
 - Respect the other person's point of view: they have a right to work in an environment free from harassment/ victimisation/ discrimination/bullying;
 - Remember that the other person's reaction/perception to the behaviour is important;
 - Agree the aspects of their behaviour that they will change;
 - Review their general conduct/behaviour at work and with workplace colleagues.

7.0 Mediation

Mediation is a voluntary process and may be considered an informal approach in resolving issues between individuals. It may be used in situations such as:

- Dealing with conflict between colleagues or between a line manager and employee;
- Rebuilding relationships after a formal dispute has been resolved;
- Addressing a range of issues including relationship breakdown, personality clashes, communication problems etc.

It should be noted that not all cases will be suitable for mediation and that both parties must be in agreement for mediation to go ahead. Should mediation be considered an option, please discuss this with your HR Business Partner who may suggest an independent mediator to take the matter forward.

8.0 Formal Resolution

- 8.1 If the alleged behaviour continues, the complainant feels unable or unwilling to deal with the matter informally, or the allegation is so serious as to prevent use of the informal procedure, a complaint should then be raised formally with the employer.
- 8.2 Normally, the employer's representative will be the employee's line manager. However, if the employee feels unable to raise the matter with their line manager they should submit the complaint in writing to a more senior manager within their Directorate (normally the next in line manager. In exceptional circumstances, allegations may be raised directly with Human Resources, who will with other appropriate senior managers, arrange for the matter to be progressed in accordance with this policy and procedure.
- 8.3 A person with no previous involvement in the case will be commissioned to undertake an appropriate investigation into any complaint under the Formal Resolution stage of this policy. The investigating manager, in consultation with Human Resources, should:
- Take full details of the incidents in writing from the complainant and advise them of their right to representation by an accredited trade union representative or workplace colleague (not involved in the allegations). Including the resolution sought.

- Take full details from any witnesses/other complainants who come forward and may have witnessed the alleged behaviour.
 - Inform the alleged perpetrator of the complaints against them, advise the alleged perpetrator of their right to representation by an accredited trade union representative or workplace colleague (not involved in the allegations), and invite them to a meeting in order that they can comment on the allegations against them.
 - Keep all parties informed of expected timescales.
 - Take all necessary action to ensure a prompt, thorough investigation to establish the circumstances of the matter.
 - Inform all parties in writing of the outcome and any action that may be required.
- 8.4 If the allegations and the working situation warrant it, the alleged perpetrator may be, in accordance with the established disciplinary procedure, suspended during the investigation, transferred temporarily to another location/role or asked to undertake amended duties, pending the outcome of the investigation. It should also be noted that the complainant may wish to move department/section depending upon the nature of the complaint and the people involved. Appropriate consideration should be given to this option where appropriate.
- 8.5 The investigating manager should report to the manager who commissioned the investigation whether they consider that the allegations could be substantiated following investigation and recommend whether the matter could be dealt with informally or through a disciplinary hearing. The commissioning manager will need to decide whether they agree with the recommendations. If the commissioning manager decides that disciplinary action is required, the matter will be dealt with in accordance with the Disciplinary Policy, using the investigation that was conducted under this policy.
- 8.6 The CCG will treat any claims with sensitivity and handle the matter as confidentially as possible. In line with the CCGs Disciplinary Policy, the investigation should take no longer than 8 weeks.
- 8.7 The starting point of the investigation will be for the investigating officer to explore with the complainant what they are hoping for as an outcome of their complaint. The purpose of the investigation will be to establish the facts and include statements and relevant interviews with the complainant, the alleged perpetrator and any relevant witnesses.
- 8.8 If through the course of the investigation evidence indicates that the allegation has been made frivolously, maliciously, or for personal gain,

the individual making the complaint may be subject to disciplinary proceedings as outlined in the CCG's Disciplinary Policy.

- 8.9 It is recognised that both raising a complaint and being subject to a complaint can be a very difficult time for people. Managers will be supportive and responsive to individual needs as far as is reasonable and appropriate in the circumstances. Staff are also encouraged to use the help available through the staff support service, (where this is in operation), details of which are available from your HR Business Partner.

9.0 Record Keeping

- 9.1 Where the complaint is informal and resolved at this stage, no record will be kept on personal files.
- 9.2 Following formal investigation, where the complaint is not substantiated, no records will be retained.
- 9.3 Where a complaint is substantiated or partially substantiated but does not proceed to a disciplinary investigation, a letter confirming the outcome will be retained on the personal file and supporting documentation retained in a separate file for a period of 12 months.
- 9.4 Where the matter proceeds to a disciplinary hearing then the storage of records should be in accordance with the disciplinary policy.

10.0 Appeal Process

Appeals against decisions taken under the Bullying and Harassment Policy shall be dealt with as follows:-

- Appeals against a disciplinary sanction will be dealt with in accordance with the Disciplinary Policy.
- Appeals by a complainant about the outcome of any investigation will be dealt with in accordance with the appeal process in the Grievance Policy.

Appendix 1: Examples of unacceptable behaviour include but are not limited to:

- Intrusion by pestering, spying, stalking;
- Unnecessary or unwanted physical contact or invasion of personal space;
- Sexually suggestive behaviour, or compromising sexual invitation or demands;
- Racial harassment- including racist jokes or graffiti;
- Displaying offensive material;
- Unwarranted or suggestive remarks;
- Verbal or written abuse including non-communication and deliberate and/or inappropriate exclusion (in work matters or socially);
- Derogatory name-calling and insults;
- Threats of a physical or psychological nature;
- Victimisation because of someone's protected characteristic;
- Overbearing behaviour or language causing fear or distress to others;
- Abuse of power or position;
- Direct or indirect discrimination;
- Intimidation of more senior employees by subordinates;
- Incitement of others to commit harassment;
- Abuse of power by CCG employees over any person working in the CCG who is not a direct employee for example an agency worker or someone from a shared service with which the CCG has a contract;
- Electronic messages or electronic displays of sexually suggestive pictures or literature (including email and text message);
- Unwelcome remarks about a person's age, dress, or religious/non-religious faith;
- Copying critical correspondence (e-mails, memos, etc.) to people who do not need to be involved;
- Sudden rages for a trivial reason, swearing or shouting at people;
- Deliberately withholding information with the intention of affecting someone's ability to do their job;
- Pattern of setting unrealistic targets which are unreasonable or changed with limited notice or consultation;
- Overbearing supervision, unfair or public criticism or undermining behaviour;
- Inappropriate or derogatory remarks and body language;
- Inappropriate literature or media.

Appendix 2: Equality Impact Assessment Stage 1 Screening Equality Analysis – Full Equality Impact Assessment

Title of policy, service, proposal etc being assessed:

Bullying and Harassment Policy

What are the intended outcomes of this work? Include outline of objectives and function aims

This policy promotes the respectful treatment of all employees within the CCG and the protection of employees from bullying and harassment at work. The CCG is committed to creating a work environment free of harassment and bullying for all employees, where everyone is treated with dignity and respect and protected from harassment, intimidation and other forms of bullying at work.

How will these outcomes be achieved? What is it that will actually be done?

The CCG believes that harassment and bullying at work in any form is completely unacceptable and will not be tolerated. All allegations of bullying and harassment will be investigated and, if appropriate disciplinary action will be taken.

The CCG will not tolerate victimisation of a person for making allegations of bullying and harassment in good faith or for supporting someone to make such a complaint.

The CCG will take such steps as are necessary to achieve these aims.

Who will be affected by this work? e.g. staff, patients, service users, partner organisations etc. If you believe that there is no likely impact on people explain how you've reached that decision and send the form to the equality and diversity manager for agreement and sign off

Staff

Evidence

What evidence have you considered? Against each of the protected characteristics categories below list the main sources of data, research and other sources of evidence (including full references) reviewed to determine impact on each equality group (protected characteristic).

This can include national research, surveys, reports, research interviews, focus groups, pilot activity evaluations or other Equality Analyses. If there are gaps in evidence, state what you will do to mitigate them in the Evidence based decision making section on page 9 of this template.

If you are submitting no evidence against a protected characteristic, please explain why.

Age Consider and detail age related evidence. This can include safeguarding, consent and welfare issues.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Disability Detail and consider disability related evidence. This can include attitudinal, physical and social barriers as well as mental health/ learning disabilities.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Gender reassignment (including transgender) Detail and consider evidence on transgender people. This can include issues such as privacy of data and harassment.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Marriage and civil partnership Detail and consider evidence on marriage and civil partnership. This can include working arrangements, part-time working, caring responsibilities.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Pregnancy and maternity Detail and consider evidence on pregnancy and maternity. This can include working arrangements, part-time working, caring responsibilities.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Race Detail and consider race related evidence. This can include information on difference ethnic groups, Roma gypsies, Irish travellers, nationalities, cultures, and language barriers.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Religion or belief Detail and consider evidence on people with different religions, beliefs or no belief. This can include consent and end of life issues.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Sex Detail and consider evidence on men and women. This could include access to services and employment.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Sexual orientation Detail and consider evidence on heterosexual people as well as lesbian, gay and bisexual people. This could include access to services and employment, attitudinal and social barriers.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Carers Detail and consider evidence on part-time working, shift-patterns, general caring responsibilities.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Other identified groups Detail and consider evidence on groups experiencing disadvantage and barriers to access and outcomes. This can include different socio-economic groups, geographical area inequality, income, resident status (migrants, asylum seekers).

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Engagement and involvement

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

Policy Forum established. Members include representatives of CCGs and Trade Unions

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

Policy Forum established. Members include representatives of CCGs and Trade Unions

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

Policy Forum established. Members include representatives of CCGs and Trade Unions

Summary of Analysis

Considering the evidence and engagement activity you listed above, please summarise the impact of your work. Consider whether the evidence shows potential for differential impacts, if so state whether adverse or positive and for which groups and/or individuals. How you will mitigate any negative impacts? How you will include certain protected groups in services or expand their participation in public life? Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

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

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Advance equality of opportunity

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Promote good relations between groups

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Next Steps

Please give an outline of what you are going to do, based on the gaps, challenges and opportunities you have identified in the summary of analysis section. This might include action(s) to eliminate discrimination issues, partnership working with stakeholders and data gaps that need to be addressed through further consultation or research. This is your action plan and should be SMART.

The CCG will review the outcomes of cases where complaints of Bullying and Harassment have been made to check that the proper procedures have been followed and to identify any points that can be learnt from those cases implementing necessary changes.

The CCG will monitor how successful it is being in creating a workplace free of bullying and harassment by other means, including the national staff survey.

How will you share the findings of the Equality analysis? This can include sharing through corporate governance or sharing with, for example, other directorates, partner organisations or the public.

Publication alongside the policy

Health Inequalities Analysis

Evidence

1. What evidence have you considered to determine what health inequalities exist in relation to your work? List the main sources of data, research and other sources of evidence (including full references) reviewed to determine impact on each equality group (protected characteristic). This can include national research, surveys, reports, research interviews, focus groups, pilot activity evaluations or other Equality Analyses. If there are gaps in evidence, state what you will do to mitigate them in the Evidence based decision making section on the last page of this template.

Developed in conjunction with the joint forum, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Impact

2. What is the potential impact of your work on health inequalities? Can you demonstrate through evidenced based consideration how the health outcomes, experience and access to health care services differ across the population group and in different geographical locations that your work applies to?

Developed in conjunction with, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

3. How can you make sure that your work has the best chance of reducing health inequalities?

Developed in conjunction with, and ratified by, the relevant committees of the Hertfordshire, Bedfordshire, West Essex and Luton CCGs.

Monitor and Evaluation

4. How will you monitor and evaluate the effect of your work on health inequalities?

New HR monitoring system being developed

Quality Impact Initial Assessment.

Quality can be defined as embracing three key components:

- Patient Safety – there will be no avoidable harm to patients from the healthcare they receive. This means ensuring that the environment is clean and safe at all times and that harmful events never happen.
- Effectiveness of care – the most appropriate treatments, interventions, support and services will be provided at the right time to those patients who will benefit.
- Patient Experience – the patient’s experience will be at the centre of the organisation’s approach to quality.

What is the impact on:

Patient Safety?	Positive <input type="checkbox"/>	Negative <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/>
Patient Experience?	Positive <input type="checkbox"/>	Negative <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/>
Clinical Effectiveness?	Positive <input type="checkbox"/>	Negative <input type="checkbox"/>	Neutral <input checked="" type="checkbox"/>

If any there is any negative impact please complete seek advice from the Nursing and Quality Team and a full Quality impact assessment will need to be completed.

Name of person(s) who carried out these analyses: Paul Curry
Date analyses were completed: 17 May 2017

HR and ODL Shared Service

Hertfordshire, West Essex,
Bedfordshire & Luton
CCGs