NHS
Cornwall and
Isles of Scilly

Equality and diversity policy

Date approved: 16 December 2025

NHS Cornwall and Isles of Scilly Integrated Care Board

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1. Introduction

NHS Cornwall and Isles of Scilly Integrated Care Board (ICB) is committed to leading and promoting diversity, equal opportunities and upholding human rights particularly in relation to the Equality Act 2010, in terms of the provision of health services for the community it serves and in its practice as a leading employer.

This policy sets out the ICB's equality, diversity and human rights commitments, and details how equality, diversity and human rights will be applied across employment, service planning and commissioning within the ICB.

The ICB has a statutory duty to ensure that the organisation promotes and implements equality and diversity. The ICB aims to be an equal opportunities employer and consistently commission services according to the equality needs of the population.

Integrated care boards are responsible for commissioning the majority of healthcare services. The ICB will not discriminate against members of the public, carers or guardians using or seeking to use services, facilities or information provided or commissioned by the organisation. The organisation aims to avoid discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy. The organisation also has a responsibility to make reasonable adjustments where arrangements potentially disadvantage an individual because of a disability.

2. Aim

The ICB aims to:

- be an organisation that leads in the promotion of equality and diversity, both in service delivery and as an employer
- provide a working environment that is safe and welcoming for all members of the workforce
- be an equal opportunities employer, building equality, diversity, and inclusiveness into all business activities
- promote a culture where people are able to seek, obtain and retain employment without discrimination, harassment, or infringement of their human rights
- ensure everyone is treated with dignity and respect
- pay due regard to the needs of inclusion health groups, as well as people with protected characteristics
- encourage colleagues to value the richness and diversity of the society that we live in
- increase awareness of how colleagues can respond to the diverse needs of service users
- ensure that colleagues understand, support, and follow its equality and diversity policy as part of its legal responsibilities

3. Purpose

The purpose of this policy is to provide colleagues within the ICB with a framework to ensure that equality, diversity, and human rights legislation is embedded within the organisation and to ensure that there are defined guidelines for members of the public, employees, and visitors to follow.

The policy will enable the ICB to deliver the expected outcomes as identified in the national Equality Delivery System, the NHS equality, diversity and inclusion improvement plan and the gender pay gap and meet its statutory requirements in the Equality Act 2010.

The ICB will:

- commission services for our service users in ways which are appropriate, accessible, and responsive
- communicate with and listen to colleagues so that the ICB will be recognised as an employer of choice
- make the best use of the range of talent and experience available within the existing and potential workforce by ensuring that recruitment and career progression is fair and transparent
- meet its legal obligations regarding the Equality Act 2010 and the public sector equality duty

This policy is intended to support the ICB to meet its commitment to equality of opportunity for all, recognises the need to ensure we eliminate discrimination, advance equality of opportunity and foster good relations. It upholds and supports all actions and outcomes as identified in the ICB's equality and human rights strategy.

4. Scope

This policy applies to all colleagues, paid or otherwise, of the ICB. This policy also applies to all temporary colleagues, agency workers, volunteers, secondees, work placements, visitors, contractors, students, and members of the public who come into contact with the ICB. All colleagues are required to comply with this policy.

This policy covers both employment and operational design and delivery. It extends to all areas of equality legislation, including human rights.

Service users, carers and family members will be treated with respect and consideration. Service users will be afforded healthcare in a consistent and non-discriminatory manner irrespective of their protected characteristics or inclusion health status.

The ICB will require organisations with which it has service contracts to have operational policies in place that do not conflict with the principles or procedures in this document.

5. Policy statement

The ICB's commitment to leading and promoting diversity, equal opportunities and supporting human rights is enshrined in our equality and diversity statement, as follows.

The ICB is committed to commissioning inclusive health services with a workforce which is equally represented. We recognise that all people are individuals in their own right and we will strive to meet their individual needs. As an organisation, we will endeavour to ensure that no one is discriminated against or treated unfairly due to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, including nationality and ethnic origin, religion or belief, sex, or sexual orientation. We will make every effort to ensure that no individual experiences less favourable treatment in any area of their working lives. Discriminatory behaviour is not acceptable and, in relation to protected characteristics, may be unlawful. The ICB will not tolerate discrimination from anyone.

This statement forms an important aspect of the ICB's commitment towards achieving our organisation's values.

This policy explicitly bans discrimination, bullying and harassment in all forms, based on any protected characteristic. The organisation has a zero-tolerance approach to discrimination and hate related speech. The organisation considers inappropriate behaviour to include, but is not limited to, homophobic, bi-phobic, transphobic, racist, sexist, ableist, misogynistic, antisemitic, or Islamophobic harassment, or any other form of religious discrimination. This policy is explicitly inclusive of same-sex couples and uses gender neutral language.

The ICB acknowledges that racism exists within Cornwall and the Isles of Scilly. We want a fairer, more inclusive Cornwall and Isles of Scilly, so everyone can thrive in a diverse, inclusive, and anti-racist environment. We believe that racism is wrong and will not tolerate racist attitudes. The ICB has a zero-tolerance approach to racism and hate crime and has an ambition to eliminate inequitable racial and ethnic outcomes for residents, service users, customers, employees, and volunteers. We commit to strengthening the hate-crime reporting programme, underpinning efforts to take concrete action to eradicate racism. Colleagues should challenge racist attitudes and behaviour and will be supported to do so. The ICB will not tolerate racist taunting or bullying and may contact the police.

Each individual carries personal responsibility for their own behaviour in relation to this policy.

6. Definitions

Direct discrimination

Direct discrimination is when someone is treated less favourably than another person because of a protected characteristic. Direct discrimination is unlawful under all anti-discrimination law, unless there is an occupational requirement that the employee be from (or not) a particular protected characteristic. For example,

specifying women only applicants to a work position at a women's rape and sexual abuse centre would usually be considered legitimate direct discrimination.

Discrimination by association

This is direct discrimination against someone because they are associated with another person who possesses a protected characteristic.

Discrimination by perception

This is direct discrimination against an individual because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to.

Diversity

Diversity is based on a principle of recognising, responding to, and valuing, visible and non-visible differences amongst individuals, ensuring everyone can thrive and contribute.

Equity

Equity means ensuring that everyone has fair access to opportunities and resources, tailored to their individual needs.

Equality

The state of being equal, having the same rights, opportunities, and status.

Equality of opportunity

Equality of opportunity means that an individual's diversity is viewed positively, that the contribution their experience, knowledge and skills can make is valued and barriers to their participation are removed.

General duty of the public sector equality duty

The general duty requires NHS organisations to have due regard to the need to:

- eliminate discrimination, harassment, victimisation, and another other prohibited conduct
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

Harassment

This is behaviour deemed offensive by the recipient. Employees can complain of any behaviour that they find offensive even if it is not directed at them. Harassment is unwanted conduct that violates people's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. It may be related to protected characteristic, and may be persistent or an isolated incident.

Hate crime

A hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by hostility or prejudice based on the following.

- A persons race or perceived race, or any racial group or ethnic background including Gypsy and Traveller groups.
- A person's religion or belief, or perceived religion or belief, or any religious groups including those who have no faith in a theology.
- A person's sexual orientation or perceived sexual orientation.
- A perceived disability, including physical disability, learning disability and neurodiversity or developmental conditions.
- A person who is transgender or perceived to be transgender, and those who hold a Gender Recognition Certificate under the Gender Recognition Act 2004.

Police will also record non-crime hate incidents where the threshold to have committed a crime is not met, but the hostility or prejudice towards a protected characteristic was evident.

Human rights

Human rights are the basic rights and freedoms that belong to every individual. They ensure fairness, respect, equality, dignity and autonomy in all aspects of life.

The Human Rights Act 1998 is a UK law that incorporates the rights set out in the European Convention on Human Rights into domestic legislation. It requires public authorities to act in a way that respects and protects these rights, allowing individuals to enforce them in UK courts.

Inclusion

Inclusion is the practice of actively including people in a way that's fair for all. An inclusive culture is when people feel safe in being themselves, when we are actively curious about and value different perspectives and experiences.

Inclusion health groups

This includes people from other disadvantaged groups, who may experience difficulties in accessing, and benefitting from, the NHS. This includes, but is not restricted to people who:

- have care experience
- are homeless
- live in poverty

- work in stigmatised occupations (such as women and men involved in sex work)
- are long-term unemployed
- misuse drugs
- have limited family or social networks
- are geographically isolated

As well as:

- asylum seekers and refugees
- current or former members of the armed forces

Indirect discrimination

Indirect discrimination refers to applying a provision, criterion, policy, rule, or practice which is applied to everyone but disadvantages a person with a particular protected characteristic. Indirect discrimination is illegal if it cannot be justified as a proportionate means of achieving a legitimate aim.

Intersectionality

Intersectionality refers to the way different aspects of a person's identity combine to create unique experiences of discrimination or disadvantage. Intersectionality recognises that people have multiple, overlapping identities, such as race, sex, disability, sexual orientation, and socio-economic status. It highlights how these intersecting identities can lead to complex forms of discrimination.

Misogyny

Misogyny refers to the hatred, contempt, or prejudice against women. This may include discriminatory attitudes, barriers to equality and impacts on workplace culture.

Positive action

Positive action is a way for NHS employers to help create a fairer and more inclusive workplace. It involves taking specific steps to support people from underrepresented or disadvantaged groups. Positive action promotes equal opportunities by removing existing inequalities or countering the effects of past inequalities.

Protected characteristics

The 9 protected characteristics of the Equality Act 2010 are:

1. Age.
2. Disability.
3. Gender re-assignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race including nationality and ethnic origin.

7. Religion or belief.
8. Sex.
9. Sexual orientation.

Reasonable adjustments

Employers have a statutory duty to make reasonable adjustments to make sure colleagues with a disability (including contract workers, trainees, apprentices, and business partners) are not seriously disadvantaged when doing their jobs. The organisation also has a responsibility to make reasonable adjustments where arrangements disadvantage an individual, such as because of a disability, and reasonable adjustments should be made to overcome the disadvantage. Reasonable adjustments could include changes to employment practices, working arrangements, policies or practices, alterations to premises, removing a physical barrier, providing a service in an alternative way, provision of equipment or aids, such as hearing loops.

Sexual harassment

Unwanted conduct of a sexual nature, that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment is legally defined as unwanted behaviour of a sexual nature. It includes verbal, non-verbal and/or physical acts and is any conduct which could:

- be of a sexual nature
- be unwanted
- have the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for a person

Sexual misconduct

Sexual misconduct is behaviour that can be interpreted by a person as sexual and which offends, embarrasses, harms, humiliates or intimidates them or a group of people. Sexual misconduct can be:

- physical
- verbal
- visual

Some forms of sexual misconduct are criminal offences.

Victimisation

This occurs when an individual is treated less favourably because they have made or supported a complaint or grievance under the appropriate equality legislation, or because they are suspected of doing so.

7. Responsibilities

Accountable officer, executive chief officers and ICB non executive members

The accountable officer is responsible to the ICB's governing body for the operation and implementation of this policy. The accountable officer is responsible to the ICB's board for the operation and implementation of this policy. They are responsible for role modelling inclusive leadership behaviours and holding themselves and their teams to account. They need to take specific and visible action to ensure that equality, diversity and inclusion is embedded and sustained, including, but not limited to, the actions and objectives set out in equality policies and plans.

Managers

Managers will:

- ensure diversity and inclusion is actively and continuously considered and reviewed in teams' work, practices and conversations
- support their colleagues to understand and apply their responsibilities relating to the policies on equality, diversity and dignity at work
- consider all service users, particularly those with protected characteristics when considering a service change and pursue timely engagement which will allow completion of an impact assessment
- ensure fair and equal treatment of all employees, and job applicants, including recruiting in line with inclusive recruitment guidance
- treat seriously and to take appropriate action in dealing with alleged claims of bullying, harassment, hate incidents, hate crime, discrimination, or victimisation
- ensure they and their team attend training and briefings to continue their personal updating and understanding of equality and diversity and bullying and harassment responsibilities and other statutory duties
- treat all disclosures including personal and or workforce information, reports of discrimination, bullying, victimisation, and harassment as confidential and seek advice from the people team about appropriate support and process for all those involved in any concerns raised

All managers and heads of service are responsible for implementing the policy in their directorates, business units and departments and for maintaining high standards of equality and diversity practice. This includes taking appropriate action where colleagues, members of the public, visitors or other individuals have acted in contradiction to the principles of this policy.

People and organisational development team

The people and organisational development team will:

- monitor implementation of the policy in relation to employment activities and policy application

- provide regular monitoring reports to support the organisation in its implementation and measure of progress of its equality, diversity and inclusion strategies and plans
- ensure all workforce policies undergo an impact assessment to screen for positive impacts and adverse impacts, to address areas of concern
- ensure appropriate training is in place for the workforce in relation to equality, diversity, and human rights
- review and monitor the policy and its associated procedures and systems to ensure they are fit for purpose
- treat all disclosures including personal and or workforce information, reports of discrimination, bullying, victimisation, and harassment as confidential
- treat all complaints sensitively, confidentially, thoroughly and in a timely manner

Any employee who has found to have been discriminated against can expect action to be taken on their behalf, and to receive support from the ICB.

Equality and diversity manager

The equality and diversity manager will provide advice and expertise to ensure the ICB‘s leaders, managers and colleagues can:

- set and achieve equality objectives
- manage and report on equality action plans
- work with senior managers and team leaders to ensure that they are achieving their equality objectives
- ensure that impact assessments are proportionate and meaningful
- build and maintain relationships with other stakeholders
- work with the people team on delivering actions relating to the workforce, and equality and diversity, such as the gender pay gap
- ensure the ICB actively engages and obtains feedback from service users, colleagues, and other stakeholders on how the organisation is performing with respect to promoting equality and eliminating discrimination
- provide advice and expertise on how new developments in equality and diversity legislation and practice are embedded within the ICB’s practices

Communications and engagement team

The communications and engagement team will:

- ensure that engagement and consultations with members of the public and service users are inclusive, to ensure that the widest and most reflective representation of people with protected characteristics are approached for their views, to ensure a broad spectrum of opinion and feedback is received
- collect data on members of the public and service users protected characteristics, appropriate to the issue where engagement and consultation is taking place, to evidence that feedback is representative of a broad spectrum of opinion and feedback

- assist the equality and diversity manager to undertake proactive engagement with members of the public and service users, to gain an understanding of people's equality and diversity experiences
- facilitate access to interpretation and translation services, where required
- provide information to members of the public and service users proactively in different formats, according to the needs of the people being communicated with
- be prepared to provide information in different formats, proactively or on request

Colleagues

Colleagues have a personal responsibility to:

- ensure they are familiar with equality policies and attend all training provided
- ensure they practice ongoing learning to carry out their duties and always behave in accordance with the principles of this policy
- treat everyone with dignity and respect
- not practice unlawful discrimination, coerce others to discriminate or victimise individuals who make complaints of discrimination or provide information for investigation
- not act in a way that would humiliate, offend, degrade, intimidate, frighten, threaten, undermine, or abuse someone, nor to promote or allow others to act in this way
- not use language or images which would be regarded as racist, sexist, homophobic, transphobic, or insulting about disability, age, or religion and belief, nor to promote or allow others to act in this way
- take an active role in assisting the ICB to meet its commitment to provide equal opportunities in employment and to avoid unlawful discrimination
- remain curious and open to others difference and experience
- make reasonable adjustments where required
- be patient and helpful, particularly if someone has difficulties communicating, understanding or difficulties with mobility
- communicate clearly

Colleagues have a duty to:

- treat people fairly and according to their needs without making assumptions
- be aware that unlawful discrimination on the grounds of protected characteristics or perceived protected characteristics is illegal and could result in legal proceedings against the ICB or themselves
- have a responsibility to report anything that they think may be perceived as discriminatory, bullying, victimisation, harassment, a hate incident or a hate crime to their line manager, a member of the people team or a freedom to speak up guardian
- report any unlawful discrimination or suspected discrimination occurring within the ICB whether by colleagues, service users, visitors, or providers
- seek advice on any aspect of this policy from their line manager, the people and organisational development team, the equality manager, or their trade union representative

The ICB's commissioning responsibilities

In addition to directly employed colleagues, it is the ICB's responsibility to ensure that commissioned and independent contractors have arrangements in place regarding equality, diversity, and human rights commitments.

8. Legislation

The 9 pieces of legislation that merged to form the Equality Act 2010 are the:

1. Equal Pay Act 1970.
2. Sex Discrimination Act 1975.
3. Race Relations Act 1976.
4. Disability Discrimination Act 1995.
5. Employment Equality (Religion or Belief) Regulations 2003.
6. Employment Equality (Sexual Orientation) Regulations 2003.
7. Employment Equality (Age) Regulations 2006.
8. Equality Act 2006 Part 2.
9. Equality Act (Sexual Orientation) Regulations 2007.

Public authorities in the UK have obligations to promote and protect human rights, as laid out in the Human Rights Act 1998. All public authorities must act in a way that is compatible with the European Convention on Human Rights. This means treating individuals fairly, with dignity and respect, whilst also safeguarding the rights of the wider community. The principles which underpin the Human Rights Act are:

- fairness
- respect
- equality
- dignity
- autonomy

The ICB has a human rights statement and guidance document to support employees to understand human rights legislation and how this applies to them in their role.

9. Compliance with the Equality Act 2010

Reporting

The committee with responsibility for overseeing equality and diversity matters within the ICB is the South West Peninsula People, Customer Experience and Equity Committee.

Data and workforce reporting

All information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be managed in accordance with the Data Protection Act 2018. This includes information which is collected by the people

team to inform the workforce report. Workforce reports are required under the public sector equality duty and will contribute to demonstrating equality within the ICB's workforce.

Equality Delivery System

The ICB will use the Equality Delivery System framework which is designed to help commissioners deliver better services and clinical outcomes to communities and members of the public, as well as an improved working environment for colleagues. As an NHS organisation, the ICB will use the EDS to establish goals and outcomes as well as evidencing how we meet these.

NHS equality, diversity and inclusion improvement plan

This improvement plan sets out targeted actions to address the prejudice and discrimination – direct and indirect – that exists through behaviour, policies, practices and cultures against certain groups and individuals across the NHS workforce. The ICB will utilise the high impact actions to work towards an improved inclusive culture.

Gender pay gap

The gender pay gap is an annual statutory disclosure for all employers with 250 or more employees. The gender pay gap is the difference between the hourly rate of pay of male employees and female employees. The gender pay gap is reported as an average on both a mean, or average, and median, or mid-point, basis. The ICB will use the gender pay gap to ensure that the pay gap is identified for its workforce, with the aim to close the gap over time.

Impact assessments

The public sector equality duty is a duty on public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act. The ICB, as an organisation, is therefore legally required to analyse and publish the effect of its policies and practices; including how the policies further the equality aims, how due regard has been given, and the sources of information used to inform decisions. The ICB needs to understand the impact of any changes proposed for our population and our colleagues. To do this, we undertake impact assessments, prior to implementation of a policy or proposed change.

The impact assessments are tools used to assess policies or services to establish how they may impact on individuals, communities, or people with protected characteristics. It involves using equality information and results from engagement with people with protected characteristics, to understand the effect or potential effect on functions, policies, and decisions. Managers responsible for service redesign and change will be accountable for completing assessments and should be able to evidence against the 3 public sector equality general duties.

Where detrimental impacts are identified, the impact assessment must show how this can be mitigated against, or whether the policy decision needs to be reviewed.

Accessible information

The NHS Accessible Information Standard is a way of ensuring that the NHS and adult social care is meeting people's communication needs. The standard seeks to make information easy to understand, and available in different formats where required. The ICB will actively take steps to ensure that information is accessible to service users, colleagues, and other stakeholders; this will include making many publications easy to read. Publications will be in accordance with the ICB's communications guidance on font size, contrast, and typeface.

The Public Sector Bodies Accessibility Regulations 2018 aim to improve digital inclusivity and applies to any website or mobile app which is bought or built by a public sector body. Any internet publications will aim to follow web accessibility standards and where possible, will allow the user to change the typeface and colours to suit their needs.

Support for colleagues

The ICB sets expected responsibilities for all colleagues. Colleagues are also entitled to support. NHS colleagues should be able to come to work without fear of violence, abuse or harassment from other colleagues or members of the public. In most cases, service users and their relatives will be appreciative towards those who treat them and commission their care but occasionally colleagues are subjected to abuse and physical violence.

The ICB is committed to ensuring that all colleagues have a working environment in which they are treated with consideration, dignity, and respect. The ICB has a duty to protect colleagues from harassment, whether from other colleagues, or members of the public. Individuals who believe that they have been harassed have a right to receive support in accordance with the ICB's grievance including dignity at work policy, acceptable behaviour policy or disciplinary procedure.

The ICB recognises that its commitment to equality and diversity is an ongoing process and will include training and development, including workshops, for this subject area for all colleagues, at all levels. Mandatory e-learning training modules on equality and diversity and aspects of human rights form part of the regular rolling training programme.

Hate crime doesn't just affect the individual person it is aimed at. It can have a major impact on whole communities. Hate crime contributes to the marginalisation of minority groups and to inequalities in access to services and opportunities. Feelings of isolation may be especially acute in our rural communities where minority groups may be small in number and there can be a limited local network of support. Hate crime also supports the spread of extremist views which heightens vulnerability to further abuse and deepens community tensions. Experience of hate crime can act as an accelerant in radicalisation.

A hate incident is perceived by the victim or any other person to be motivated by hostility or prejudice towards a protected characteristic. This may be an incident involving prejudicial behaviour where the criminal threshold isn't met.

If discrimination or harassment is based on the person's race, religion, sexual orientation, disability, or sex it may be defined as a hate crime or hate incident which can be reportable to the police. The ICB will provide support to report any such incidents to the police, to a third party reporting centre or anonymously via True Vision.

Where to go if you need advice or support

Any staff member who feels that they have been a victim of discrimination or harassment can report their concerns to:

- their line manager
- a member of the people team
- employees also have the support of trade unions or employee representatives
- members of staff who have been trained to support others in the organisation, such as mental health first aiders
- freedom to speak up guardians

Managers will provide support following any incident of behaviour which may include, but is not limited to:

- de-briefing
- access to internal support, supervision, or coaching
- referral to occupational health
- support for counselling

10. Update and review

This policy will be reviewed and monitored annually by the ICB to determine its effectiveness and to ensure that the organisation is compliant with statutory duties. The policy will be updated in accordance with changes in the law.

11. Policies referred to in this document

All ICB policies make explicit the need to give due regard to equality and diversity. This policy also refers to the following policies.

- Acceptable behaviour policy
- Disciplinary policy and procedure
- Grievance and dignity at work policy
- Human rights statement and guidance
- Sexual misconduct policy
- Freedom to speak up policy

Appendix 1: Impact assessment

Name of policy or service to be assessed: Equality and diversity policy
Department or section: Corporate governance and people and organisational development team
Date of assessment: Updated 30 September 2025
Person(s) responsible for the assessment: Jayna Chapman, equality manager and Emma Goudge, head of people team
Is this a new or existing policy? Existing

Aims, objectives and purpose of the policy

Describe the aims, objectives, and purpose of the policy.

This policy outlines NHS Cornwall and Isles of Scilly ICB's commitment to promoting equality, diversity, and upholding human rights across employment, service planning, and commissioning. It aims to:

- Promote equality of opportunity and eliminate discrimination in all organisational practices.
- Support an inclusive culture where all individuals are treated with dignity and respect.
- Ensure compliance with the Equality Act 2010 and Public Sector Equality Duty.
- Provide a framework for colleagues to understand and apply equality legislation.
- Embed human rights principles of fairness, respect, equality, dignity, and autonomy into everyday practice.
- Improve service delivery by responding to diverse needs and reducing health inequalities.

The policy aims to foster a fair and inclusive working and service environment.

Who is intended to benefit from this policy, and in what way?
ICB colleagues and members of the public, through setting clear expectations and outlining support available.

What outcomes are wanted from this policy?
- Better understanding of legal implications of the Equality Act 2010.
- Guidance and support for colleagues in understanding equality legislation.
- Building equality, diversity and inclusiveness into mainstream business and ensuring everyone is treated with dignity and respect.
- Promoting the practice of equality of opportunity and inclusion to ensure that all colleagues understand, support, and follow the equality and diversity policy and realise they have a responsibility not to discriminate unlawfully or to knowingly assist in discriminatory practices.

What factors or forces could contribute or detract from the outcomes?
Lack of employee time to read and understand the equality and diversity policy.
Inconsistent implementation of the policy.

Who are the main stakeholders in relation to the policy?

- ICB employees.
- Members of the public.

Who implements the policy, and who is responsible for the policy?
Corporate governance and people team

Differential impacts

Does this have a positive or negative impact on people from an ethnic minority background? How will any negative impact be mitigated?
This policy sets out a clear anti-racism statement and acknowledges that racism does exist within Cornwall and the Isles of Scilly. The policy commits to a zero-tolerance approach to racism and hate crime. It promotes inclusive commissioning and non-discriminatory employment practices, ensuring fair treatment regardless of race, nationality, or ethnic origin. The policy aims to set clear expectations and outline support available for people.

There may be difficulty in communicating with individuals whose first language is not English. This will be redressed by ensuring that information is available in a variety of languages and format and access to interpretation services.

Does this have a positive or negative impact on people who identify as male, female or intersex? How will any negative impact be mitigated?
The reinforcement in this policy of fair, open recruitment and employment practices, regardless of sex, marital or civil partnership status and pregnancy and maternity, contributes towards ensuring that the ICB is an equal opportunities employer. It promotes equality of opportunity and explicitly prohibits discrimination, harassment, and victimisation based on sex or gender identity.

What is the positive or negative differential impact on people from the perspective of disability? How will any negative impact be mitigated?
Arrangements must be made to ensure availability of information in accessible formats, such as easy read, to mitigate any differential impact.

Reasonable adjustments must be made in our employment practices. The ICB operates under the Disability Confident employer scheme and guidance, which includes interviewing disabled applicants who meet essential criteria. We also strive to meet the requirements of the Accessibility Regulations 2018 to work towards digital inclusivity, for our colleagues and members of the public.

It promotes non-discriminatory recruitment and employment practices, ensuring fair treatment for individuals with a disability.

Does this have a positive or negative impact on people who identify as heterosexual, lesbian, gay, bisexual, pansexual or asexual? How will any negative impact be mitigated?
The policy states that due regard must be given to sexual orientation of all users. Recruitment and employment practices are designed to be fair and transparent, regardless of sexual orientation. The policy promotes a culture of dignity, respect,

and inclusion, ensuring that all colleagues and service users are treated equitably. This policy is explicitly inclusive of same-sex couples and uses gender neutral language. This policy outlines the organisation's zero-tolerance approach to discrimination and hate related speech.

What is the positive or negative differential impact on people from the perspective of age? How will any negative impact be mitigated?
The policy pays attention to ensuring all equality strands are considered and practiced in all recruitment processes and for people accessing our commissioned services. Reasonable adjustments will be considered through the engagement and consultation process to ensure that groups affected by a change are engaged so their views can be taken into consideration.

What is the positive or negative differential impact on people from the perspective of religion or belief? How will any negative impact be mitigated?
The ICB recognises the need for colleagues to balance their work and religious and cultural needs. We also recognise that, at times, religious and cultural needs may conflict with existing work requirements. The ICB will give due consideration to whether it is reasonably practicable to vary or adapt these requirements to enable such needs to be met. The ICB supports a culture of dignity, respect, and inclusion, which includes religious and philosophical beliefs.

What is the positive or negative differential impact on people from the perspective of marriage and civil partnership? This is particularly relevant for employment policies. How will any negative impact be mitigated?
The policy demonstrates due regard to marital and civil partnership status. The policy reinforces the ICB's commitment to fair and transparent recruitment and employment practices, ensuring that individuals are not treated less favourably due to their marital or civil partnership status. The policy promotes a culture of dignity, respect, and inclusion, which extends to relationship status.

Does this have a positive or negative impact on people who identify as trans or transgender, non-binary, or gender fluid? How will any negative impact be mitigated?
The policy is explicitly inclusive of trans, non-binary, and gender fluid individuals. This policy pays attention to ensuring all equality strands are considered and practiced in all recruitment processes and for people accessing our commissioned services. The ICB supports non-discriminatory employment practices, ensuring fair treatment in recruitment, career progression, and workplace culture. This policy uses gender neutral language. This policy outlines the ICB's zero-tolerance approach to bullying and harassment.

Does this have a positive or negative impact on people who are pregnant, breast feeding mothers, or those on maternity leave? How will any negative impact be mitigated?
The policy states that due regard must be given to users. It promotes fair and transparent recruitment and employment practices, ensuring that individuals are not disadvantaged due to pregnancy, breastfeeding, or maternity leave. The ICB supports a culture of dignity, respect, and inclusion, which extends to people during

and after pregnancy. Reasonable adjustments are considered to support people within the workplace.

Are they any other identified groups? How will any negative impact be mitigated?
The ICB aims to pay due regard to the needs of inclusion health groups, as well as people with protected characteristics, as outlined in this policy. The policy commits to paying due regard to the needs of inclusion health groups, ensuring they are considered in service design, commissioning, and employment practices. It promotes inclusive engagement and consultation, aiming to capture the views and experiences of these groups. It supports accessible information and communication tailored to diverse needs.

Human rights values

How have the core human rights values of fairness, respect, equality, dignity, and autonomy been considered in the formulation of this policy, service, or strategy?
The core human rights principles underpin the basis of this policy. The policy supports these rights:

- through non-discriminatory employment and service practices
- by promoting inclusive engagement and consultation
- by ensuring reasonable adjustments and accessible information
- by protecting individuals from harassment, hate crime, and victimisation
- by supporting freedom of identity and belief, including gender identity and religion

Which of the human rights articles does this document impact?

☒ To life
☒ Not to be tortured or treated in an inhuman or degrading way
☒ To liberty and security
☒ To a fair trial
☒ To respect for home and family life, and correspondence
☒ To freedom of thought, conscience, and religion
☒ To freedom of expression
☒ To freedom of assembly and association
☒ To marry and found a family
☒ Not to be discriminated against in relation to the enjoyment of any of the rights contained in the European Convention
☒ To peaceful enjoyment of possessions

Which of the UN Convention on the Rights of the Child does this document impact?

Every child has the right to:

☐ Relax and play (Article 31)

☒ Freedom of expression (Article 13)
☒ Be safe from violence (Article 19)
☐ An education (Article 28)
☐ Protection of identity (Article 8)
☒ Sufficient standard of living (Article 27)
☒ Know their rights (Article 42)
☒ Health and health services (Article 24)

What existing evidence (either presumed or otherwise) do you have for this?
The core human rights principles underpin the basis of this document.

How will you ensure that those responsible for implementing the policy are aware of the human rights implications and equipped to deal with them?
The human rights statement and guidance accompanies the impact assessment guidance, to provide comprehensive information for colleagues. This policy will be made available for colleagues on the website and proactively disseminated via the staff update.

Public Sector Value Act 2012

NHS Cornwall and Isles of Scilly is committed and obliged to fulfil the requirements of the Public Sector Social Value Act 2012. This act requires the organisations to consider how services commissioned or procured might improve the economic, social, and environmental wellbeing of an area.

Please describe how this will support and contribute to the local system, wider system, and community.
This policy encourages the ICB to have, maintain and support a diverse workforce. It contributes to supporting employees well, maintaining employment, and promotes inclusion for people from vulnerable groups. The policy encourages inclusive service commissioning, ensuring that services are accessible and equitable for all residents, including those from inclusion health groups. The policy aligns with national frameworks and legal duties, supporting legal and ethical standards across the NHS. It encourages collaborative working with provider organisations and contractors to uphold equality and human rights commitments.

Describe how the policy contributes towards eliminating discrimination, harassment, and victimisation.
This policy clearly outlines the requirement of ICB employees, members of the public and provider organisation's colleagues to be compliant with the requirements of the Equality Act 2010. This includes a requirement to eliminate discrimination, harassment, and victimisation in all our public facing and employment practices. The ICB adopts a zero-tolerance stance on discrimination and hate-related speech. It affirms that discriminatory behaviour may be unlawful and will not be tolerated from anyone; whether colleagues, service users, or contractors. Recruitment, promotion, and service delivery are designed to be fair, transparent, and inclusive, ensuring equal access and opportunity for all. The policy supports reasonable adjustments for disabled individuals and others who may face barriers.

Describe how the policy contributes towards advancing equality of opportunity.
This policy clearly outlines the requirement of ICB employees, members of the public and provider organisation's colleagues to be compliant with the requirements of the Equality Act 2010. This includes a requirement to work towards advancing equality of opportunity for all people with protected characteristics. Recruitment, promotion, and career progression are designed to be fair, transparent, and inclusive, ensuring equal access to opportunities. The policy supports positive action to address underrepresentation and disadvantage, helping to remove barriers and improve outcomes for marginalised groups. Services are commissioned in ways that are appropriate, accessible, and responsive to the diverse needs of the population. The policy ensures that inclusion health groups (such as people experiencing homelessness, poverty, or social isolation) are considered in service design and delivery. The ICB commits to making reasonable adjustments for disabled individuals and others who may face barriers, both in employment and service access. It promotes digital and communication accessibility, including compliance with the NHS Accessible Information Standard and Accessibility Regulations 2018.

Describe how the policy contributes towards promoting good relations between people with protected characteristics.
This policy clearly outlines the requirement of ICB employees, members of the public and provider organisation's colleagues to be compliant with the requirements of the Equality Act 2010. This includes a requirement to contribute towards promoting good relations between people with protected characteristics. The policy promotes a culture where everyone is treated with dignity and respect, regardless of their protected characteristics. It encourages colleagues to value the richness and diversity of society and to remain open and curious about others' experiences. The ICB adopts a zero-tolerance approach to discrimination, bullying, harassment, and hate-related speech. It explicitly supports anti-racism, gender inclusivity, and LGBTQ+ inclusion, helping to foster mutual respect and understanding. The policy ensures that engagement and consultation processes are inclusive and representative of people with protected characteristics. It supports accessible communication, including translation and interpretation services, to ensure everyone can participate fully. The policy supports positive action to address disadvantage and underrepresentation. It ensures reasonable adjustments are made to remove barriers and enable full participation in work and services.

If the differential impacts identified are positive, explain how this policy is legitimate positive action and will improve outcomes, services and or the working environment for that group of people.
This policy clearly outlines the requirement of ICB employees, members of the public and provider organisation's colleagues to be compliant with the requirements of the Equality Act 2010.

Explain what amendments have been made to the policy or mitigating actions have been taken, and when they were made.
None identified.

If the negative impacts identified have been unable to be mitigated through amendment to the policy or other mitigating actions, explain what your next steps are using the following equality impact assessment action plan.
Not applicable.

Signed (completing officer): Jayna Chapman

Date: 30 September 2025

Signed (head of department or section): Aisling Crombie, Acting chief nursing officer

Date: 3 December 2025

Please ensure that a signed copy of this form with the policy is sent to both the corporate governance team and equality and diversity lead.