

Equality Impact Assessment (EIA)

Legislation requires that our policy documents consider the potential to affect groups differently and eliminate or minimise this where possible. This process helps address inequalities by identifying steps to ensure equal access, experience, and outcomes for all groups of people.

Step One – Policy Definition

Function/policy name and number:	Jehovah's Witness (Adult and Children) and Other Patients Refusing Blood Component Transfusions Policy
Main aims and intended outcomes of the function/policy:	<p>The ethos of the Trust is to respect individual autonomy. While the views and wishes of an adult Jehovah's Witness (JW) patient with regard to blood transfusion must always be absolutely respected, this is not always the case where children or adults without capacity are concerned, and the wellbeing of the child or vulnerable adult must be paramount.</p> <p>To administer blood to a patient who has steadfastly refused to accept it either by the provision of an Advance Decision document or by its exclusion in a consent form is unlawful, ethically unacceptable and may lead to referral to the General Medical Council, criminal and/or civil proceedings.</p>
How will the function/policy be put into practice?	<p>The aims of this policy are:</p> <ul style="list-style-type: none"> · To provide guidance on the legal and consent issues related to refusal of blood transfusion · To protect the rights of individuals who refuse to be treated with blood, blood components and blood products · To provide information to clinicians about the management of these patients · To describe the pathway for haemoglobin optimisation prior to elective surgery · To facilitate and expedite non-blood medical management for any patient refusing blood components. <p>Whilst it is acknowledged that the majority of patients refusing blood transfusion will be JWs, there are refusals from the non-Jehovah's Witness population. This policy is applicable to either group but will refer to these patients as JWs for simplicity.</p>
Who will be affected/benefit from the policy?	Staff & Patients
State the type of document:	Policy
Is an EA required? NB: Most policies/functions will require an EA with a few exceptions, such as routine procedures-see guidance attached	Yes
Accountable Director: (Job Title)	Chief Operating Officer
Assessment Carried out by:	Consultant Haematologist and Transfusion Lead

Date Completed:	11.03.2026
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To help you to determine the impact of a strategy or policy, think about how it relates to the Public Sector Equality Duty, the key questions as listed below and prompts for each protected characteristic are included Step 3:

- Eliminate unlawful discrimination, victimisation, and harassment
- Advancing equality of opportunity
- Fostering good community relations

KEY QUESTIONS

- Are people with protected characteristics likely to be affected differently even though the policy is the same for everyone?
- Could there be issues around access, differences in how a policy is experienced and whether outcomes vary across groups?
- What information /data or experience can you draw on to indicate either positive or negative impact on different groups of people in relation to implementing this function policy?

Step Two – Evidence & Engagement

Research/Publications <i>(List any publications or research you have looked at here)</i>
Royal College of Surgeons (2016) Caring for patients who refuse blood
Association of Anaesthetists (2018) Anaesthesia and peri-operative care for Jehovah's Witnesses and patients who refuse blood
Working Groups <i>(Have you consulted with any groups?)</i>
<ul style="list-style-type: none"> • Transfusion Team • Haematology QPDT • Haematology Governanc • GHOPE Governance • DGRM Governance
Clinical or Subject Experts <i>(Have you consulted any experts? List them here)</i>
<ul style="list-style-type: none"> • Consultant Haematologists, • Weightmans LLP • Claims and Litigation Manager • Lead Transfusion Practitioner • Preop Lead
Engagement Activity Focused on Protected Groups <i>(Age, disability, race, sex, gender reassignment, marriage & civil partnership, pregnancy & maternity, religion or belief, sexual orientation, Other marginalised groups e.g. Homeless people or anything privacy or dignity related)</i>
Name of Source: N/A Date: N/A Protected Characteristic: N/A

Direct consultation with patients was not undertaken due to the clinical and legal nature of the policy. However, the policy has been developed with reference to national guidance and evidence from clinical practice relating to Jehovah's Witness patients and other groups refusing blood transfusion.

Summary of the feedback received from the engagement activity focused on protected groups:

- Feedback emphasised the need for clear legal guidance, consistent documentation, staff confidence in decision-making, and respectful communication with patients and families. No evidence was identified that the policy would intentionally disadvantage any protected group when applied correctly.

Step Three – Assessment of Impact

Complete **relevant** boxes below to help you record your assessment.

Consider information and evidence from the previous section covering:

- Engagement activities
- Equalities monitoring data
- Wider research

Also, consider due regard under the general equality duty, the NHS Constitution and Human Rights.

What detail is required below:

A negative impact requires every box to be completed

Positive impacts need the first three boxes completed

Neutral impacts need to be marked neutral with no other details.

Age: Describe age-related impact and evidence. This can include safeguarding, consent and welfare issues:	
Positive, negative or neutral impact:	Positive Impact
If the impact is positive or negative, is it low, medium, or high risk for this group?	Medium
Concern or Benefit	The policy provides clarity for different age groups, safeguarding children and supporting lawful decision-making for adults and young people. Mitigations include clear escalation pathways, court involvement where required, safeguarding processes, and professional guidance.

Disability: Describe disability related impact and evidence. This can include attitudinal, physical, communication and social barriers, as well as mental health/ learning disabilities, cognitive impairments	
Positive, negative or neutral impact:	Positive Impact
If the impact is positive or negative, is it low, medium, or high risk for this group?	Medium

Concern or Benefit	Explicit consideration of mental capacity ensures decisions are made in best interests and protects patients with cognitive impairment. Mitigations include, Use of Mental Capacity Act assessments, reasonable adjustments, involvement of advocates and carers where appropriate.
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Gender re-assignment: Describe any impact and evidence on transgender people. This can include issues such as privacy of data and harassment:	
Positive, negative or neutral impact:	Neutral Impact

Marriage and civil partnership: Describe any impact and evidence in relation to marriage and civil partnership. This can include working arrangements, part-time working, and caring responsibilities:	
Positive, negative or neutral impact:	Neutral Impact

Pregnancy & Maternity: Describe any impact and evidence on pregnancy and maternity. This can include working arrangements, part-time working, and caring responsibilities:	
Positive, negative or neutral impact:	Positive Impact
If the impact is positive or negative, is it low, medium, or high risk for this group?	Medium
Concern or Benefit	Clear guidance for obstetric patients refusing blood improves safety and consistency of care. Mitigation includes, Early identification, multidisciplinary planning, specialist guidance.

Race: Describe race-related impact and evidence. This can include information on different ethnic groups, Roma gypsies, Irish travellers, nationalities, cultures, and language barriers:	
Positive, negative or neutral impact:	Positive Impact
If the impact is positive or negative, is it low, medium, or high risk for this group?	Low
Concern or Benefit	Policy recognises cultural and language needs and links to interpretation services.

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Religion or Belief: Describe any religion, belief or no belief impact and evidence. This can include dietary needs, consent and end-of-life issues:

Positive, negative or neutral impact:	Positive Impact
If the impact is positive or negative, is it low, medium, or high risk for this group?	Medium
Concern or Benefit	<p>Promotes respect for religious belief while balancing legal and safeguarding responsibilities. Mitigations include, Staff training, avoidance of assumptions, individualised care planning.</p> <p>The policy does not privilege or disadvantage any faith group and applies equally to all patients who refuse blood transfusion, ensuring lawful, equitable and person-centred care.</p>

Sex: Describe any impact and evidence on men and women. This could include access to services and employment:

Positive, negative or neutral impact:	Neutral Impact
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Sexual Orientation: Describe any impact and evidence on heterosexual people as well as lesbian, gay and bisexual people. This could include access to services and employment, attitudinal and social barriers:

Positive, negative or neutral impact:	Neutral Impact
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Other marginalised groups, e.g. Homeless people: Describe any impact and evidence on groups experiencing disadvantage and barriers to access and outcomes. This can include lower socio-economic status, resident status (migrants, asylum seekers), homeless, looked after children, single parent households, victims of domestic abuse, victims of drugs / alcohol abuse: (This list is not exhaustive)

Positive, negative or neutral impact:	Positive Impact
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If the impact is positive or negative, is it low, medium, or high risk for this group?	Low
Concern or Benefit	Policy applies equally to non-Jehovah's Witness patients who refuse blood for personal or cultural reasons. Mitigations include, Inclusive language and application beyond a single faith group.

Privacy, dignity, respect, fairness etc:	
Positive, negative or neutral impact:	Positive Impact
If the impact is positive or negative, is it low, medium, or high risk for this group?	Medium
Concern or Benefit	Clear focus on confidentiality, respectful communication and private decision-making.

Step Four – Assurance

Title	Directorate Manager
Date	11.03.2026

EQUALITY IMPACT ASSESSMENT (EIA) - GUIDANCE

NOTES

An equality impact assessment (EIA) ensures that issues of equality, diversity, and inclusion are considered when developing or revising strategies, policies, or proposals that affect the delivery of services and the employment practices of the Trust.

Why should we carry out an EIA?

We are required to carry out equality impact assessments because:

- There is a legal requirement to do so in relation to the protected characteristics
- They help identify gaps and make improvements to services
- They help avoid continuing or adopting harmful policies or procedures
- They help you to make better decisions
- They will help you to identify how you can make your services more accessible and appropriate
- They enable the Trust to become a better employer

Equality Impact Assessments help us to:

- Determine how the Trust strategy, policies and practices, or new proposals, will impact or affect different community groups, especially those groups or communities who experience inequality, discrimination, social exclusion or disadvantage.
- Measure whether strategies, policies or proposals will have a negative, neutral, or positive effect on different communities.
- Make decisions about current and future services and practice in fuller knowledge and understanding of the possible outcomes for different communities or customer groups.

What do we need to assess?

Trust policies are subject to a 3-year review. Alongside the reviews, new policies will emerge. Most policies, strategies, and business plans will need an EIA.

However, EIAs are not required for changes in routine procedures, administrative processes, or initiatives that will not have a material impact on staff, patients, carers, and the wider community. Examples include checking the temperature of fridges, performing highly technical clinical procedures, and office moves.

DGFT Process for EIAs

The revised EIA process is a single-stage process carried out in three steps.

Step One: Policy Definition

This involves a description of the policy details. This is the fact-finding stage where you gather as much information about the strategy, policy or function you intend to assess. Who will be using the service, policy or function and the outcomes you want to achieve. It is important to make sure that your service, policy or function has clear aims and objectives.

Step Two: Evidence and Engagement

EIAs should be underpinned by sound data and information. This should be sought from various sources:

- The knowledge and experience of the people assisting in the service.
- ONS local demography/ Census data: [Census Maps - Census 2021 data interactive, ONS](#)
- Service monitoring reports / Divisional reports
- Patient satisfaction surveys
- Workforce monitoring reports
- Complaints and comments
- Outcome of consultation exercises
- Feedback from focus groups
- Feedback from organisations representing the interests of key target groups
- National and local statistics and audits [Joint Strategic Needs Assessment - All About Dudley Borough](#)
- Academic, qualitative and quantitative research
- Ward/ Divisional reviews
- Anecdotal data

This stage allows you to identify whether your strategy, policy or function has a positive or negative or potential negative impact on the protected characteristics. In some cases, an initial EIA is all you will need to establish whether you are providing equal outcomes for staff or patients. If you receive no feedback or concerns, you can mark each characteristic in section 3 as a neutral impact.

Step Three: Assessment of Impact

This is the central and most important part of the EIA.

To help you determine the impact of the strategy or policy, consider how it relates to the Public Sector Equality Duty. The key questions and prompts for each protected characteristic are listed below.

- Eliminate unlawful discrimination, victimisation, and harassment
- Advancing equality of opportunity
- Fostering good community relations

The real value of completing an EIA lies in the actions that will take place and the positive changes that will emerge from conducting the assessment. To ensure that the action plan is more than just a list of proposals and good intentions, the following should be included:

- Each action is attributed to a key person who is responsible for its completion
- An achievable timescale that is also at the same time reasonable
- Relevant and appropriate activities and progress milestones
- How the action will be monitored/reviewed

KEY QUESTIONS

- What information /data or experience can you draw on to indicate either a positive or negative impact on different groups of people with implementing this function policy
- Are people with protected characteristics likely to be affected differently even though the policy is the same for everyone?
- Could there be issues around access, differences in how a service or policy is experienced and produce outcomes that vary across different groups
- Does the policy relate to the Trust's equality objectives?

NB mitigation measures must be identified and acted upon where an adverse impact is known or likely.

Step Four: Assurance

This section enables the EIA to be signed off by a head of or director for the area. This will assure the equality team that the EIA has been conducted thoroughly and thoughtfully.

Help & Support:

The equalities team will provide advice and support throughout the EIA process. Once you have completed your EIA, you must submit these documents to the procedural documents team, who will then ask the equalities team to sign off on the final version of the form.

For training, guidance and resources, including completed example forms, please visit the equality, diversity and inclusion hub pages: [Equality Impact Assessments](#) accessible

Copies of the EIA:

The manager who completed the strategy or policy review should keep copies of the form for monitoring/revisiting at the following policy review. Procedural documents will also keep a copy on file. All EIA will then be published on our external web pages to demonstrate due regard for the Public Sector Equality Duty.