

# 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

<b>Function/policy name and number:</b>	Prevent - Implementation Policy
<b>Main aims and intended outcomes of the function/policy:</b>	The information contained within this policy will highlight direction, processes and procedures to be adopted by The Dudley Group NHS Foundation Trust in relation to the implementation of the Prevent agenda.
<b>How will the function/policy be put into practice?</b>	NHS staff will safeguard and support vulnerable individuals—whether service users, patients, or staff—who are identified as being at risk of radicalisation by extremists. Robust systems will be in place to enable staff to raise concerns where they believe this form of exploitation may be occurring. The Trust will promote and maintain safe environments that prevent extremist activity. A Trust-wide training and awareness programme will be delivered to ensure staff understand their responsibilities under the Prevent agenda.
<b>Who will be affected/benefit from the policy?</b>	All vulnerable individuals who may be at risk of being radicalised/drawn into terrorism (both adults and children) DGFT staff as the role and responsibilities are identified within the policy Multi-agency partners, through improved coordination and shared standards
<b>State the type of document:</b>	Policy
<b>Is an EA required?</b> NB: Most policies/functions will require an EA with a few exceptions, such as routine procedures-see guidance attached	Yes
<b>Accountable Director:</b> (Job Title)	Chief Nurse
<b>Assessment Carried out by:</b>	Named Nurse for Safeguarding Adults/ Lead Named Nurse for Safeguarding Adults
<b>Date Completed:</b>	12/01/2026

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

<b>Research/Publications</b> <i>(List any publications or research you have looked at here)</i>
<a href="#">HM Government PREVENT strategy 2011</a> <a href="#">Counter-Terrorism and Security Act 2015</a> <a href="#">Prevent duty guidance : England and Wales (2023)</a> <a href="#">Counter-terrorism strategy (CONTEST) 2023</a> <a href="#">Terrorism Act 2006</a> <a href="#">Care Act 2014</a> <a href="#">Data Protection Act 2018</a> <a href="#">Human Rights Act 1998</a> <a href="#">Equality Act 2010</a> <a href="#">NHS England » 2023/24 NHS Standard Contract</a> <a href="#">NHS Prevent training and competencies framework</a>
<b>Working Groups</b> <i>(Have you consulted with any groups?)</i>
Internal Safeguarding Board
<b>Clinical or Subject Experts</b> <i>(Have you consulted any experts? List them here)</i>
Consultant Lead for Safeguarding Adults Equality, Diversity and Inclusion Team Children's Safeguarding Team Adult Safeguarding Team
<b>Engagement Activity Focused on Protected Groups</b> <i>(Age, disability, race, sex, gender reassignment, marriage &amp; civil partnership, pregnancy &amp; maternity, religion or belief, sexual orientation, Other marginalised groups e.g. Homeless people or anything privacy or dignity related)</i>
<b>Name of Source:</b> LGBTQ Staff Network <b>Date:</b> 30/12/25 <b>Protected Characteristic:</b> Sexual orientation and gender reassignment
<b>Name of Source:</b> Disability Staff Network <b>Date:</b> 30/12/25 <b>Protected Characteristic:</b> Disability
<b>Name of Source:</b> EmbRACE Staff Network <b>Date:</b> 30/12/25 <b>Protected Characteristic:</b> Race, religion or belief

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

No feedback received.

## 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.

<b>Age:</b> Describe age-related impact and evidence. This can include safeguarding, consent and welfare issues:	
<b>Positive, negative or neutral impact:</b>	Neutral – covers all ages, adults and children

<b>Disability:</b> Describe disability related impact and evidence. This can include attitudinal, physical, communication and social barriers, as well as mental health/ learning disabilities, cognitive impairments	
<b>Positive, negative or neutral impact:</b>	Positive
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Low
<b>Concern or Benefit</b>	Benefit – those with illnesses and physical needs are identified in the policy (appendix 4) to be considered as vulnerable to the risk of radicalisation and concerns should be managed through the safeguarding process

<b>Gender re-assignment:</b> Describe any impact and evidence on transgender people. This can include issues such as privacy of data and harassment:	
<b>Positive, negative or neutral impact:</b>	Neutral

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

<b>Pregnancy &amp; Maternity:</b> Describe any impact and evidence on pregnancy and maternity. This can include working arrangements, part-time working, and caring responsibilities:	
<b>Positive, negative or neutral impact:</b>	Neutral

<b>Race:</b> Describe race-related impact and evidence. This can include information on different ethnic groups, Roma gypsies, Irish travellers, nationalities, cultures, and language barriers:	
<b>Positive, negative or neutral impact:</b>	Negative
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Low
<b>Concern or Benefit</b>	<p>The Prevent policy applies to all individuals regardless of race, ethnicity, nationality, culture, or language. It addresses the risk of radicalisation and terrorism across a range of ideologies. Within this context, the policy explicitly recognises extreme right-wing terrorism and white supremacist ideologies as areas of concern, in line with UK Government guidance and legislation.</p> <p>While the policy does not target individuals or communities based on race, there is a potential for perceived negative impact among some racial or ethnic groups where extreme right-wing ideologies are associated with racist narratives.</p> <p>However, the policy focuses on ideology and behaviour, not racial or ethnic identity.</p>
<b>If a negative impact, how will it be mitigated?</b>	<p>The negative impact cannot be mitigated within the policy itself, as the identification of these groups is mandated by the UK Government under the Terrorism Act 2000.</p> <p>The Prevent policy reflects this statutory requirement and does not extend beyond the legal framework.</p>

<b>Who will lead on this</b>	N/A
<b>When will it be mitigated?</b>	N/A
<b>How will you monitor/review or report this?</b>	The policy will be reviewed and updated in line with changes to UK legislation, national guidance, and Prevent duty requirements. Any amendments to the list of proscribed organisations or relevant government guidance will be reflected in policy updates.

<b>Religion or Belief:</b> Describe any religion, belief or no belief impact and evidence. This can include dietary needs, consent and end-of-life issues:	
<b>Positive, negative or neutral impact:</b>	Negative
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Low
<b>Concern or Benefit</b>	<p>The Prevent policy applies equally to people of all religions and beliefs, including those with no religious belief. It considers the risk of radicalisation across a range of extremist ideologies, in line with UK Government guidance.</p> <p>The policy identifies Islamist extremist ideology as an ideology of concern where it aligns with terrorism-related activity. This refers specifically to political extremist ideologies, not to the Islamic faith itself. Islam is a widely practised religion in the UK, and the policy does not target individuals based on religious belief, religious practice, or cultural identity.</p> <p>However, there is a potential for perceived negative impact among some Muslim individuals or communities due to the association of Islamist extremism with terrorism. There is no evidence within the policy of discrimination related to religious practices such as dietary needs, consent, end-of-life care, or other faith-based requirements.</p>

	Islamist extremist ideology is identified in the policy as an ideology of concern. This classification is based on national counter-terrorism assessments and applies to specific terrorist groups and violent ideologies, not to the Islamic religion or peaceful religious expression.
<b>If a negative impact, how will it be mitigated?</b>	Unable to mitigate risk as groups are listed as concern by the UK government under The Terrorism Act 2000 – proscribed organisations. Some Islamic terrorist groups are banned in the UK including ISIS and Al-Qa’iada. Proscription makes it a criminal offence to belong to, invite support to or express an opinion or belief that is supportive of the proscribed organisation.
<b>Who will lead on this</b>	N/A
<b>When will it be mitigated?</b>	N/A
<b>How will you monitor/review or report this?</b>	The policy will be monitored and reviewed in line with changes to UK legislation, Prevent duty guidance, and national counter-terrorism policy. Updates will be made promptly where legislative or policy changes occur.

<b>Sex:</b> Describe any impact and evidence on men and women. This could include access to services and employment:	
<b>Positive, negative or neutral impact:</b>	Negative
<b>If the impact is positive or negative, is it low, medium, or high risk for this group?</b>	Low
<b>Concern or Benefit</b>	The Prevent policy applies equally to all individuals regardless of sex and does not restrict access to services or employment. It considers the risk of radicalisation across a range of extremist ideologies that may disproportionately affect demographic groups. The policy identifies incel (involuntary celibate) ideology as an ideology of concern. This ideology is associated with online radicalisation, misogynistic views, and hostility towards women, and is predominantly linked to some men and boys.

	<p>While the policy does not target men as a group, there is a potential perceived negative impact due to the association of this ideology with male gender.</p> <p>The policy is focused on ideological risk and harmful behaviours, not sex or gender identity. There is no evidence that women are disadvantaged in terms of access to services or employment as a result of this policy, and the policy may offer a protective benefit to women by addressing ideologies associated with misogyny and violence.</p>
<b>If a negative impact, how will it be mitigated?</b>	<p>Although no one 'incel' group has been designated as a single proscribed terrorist organisation by UK government due to no identified cohesive, organised group meeting the legal threshold for proscription under The Terrorism Act 2000 there are still significant concerns for the radicalisation and extreme views within this group.</p> <p>The policy does not criminalise beliefs but supports early identification and safeguarding where extreme views present a risk of harm.</p>
<b>Who will lead on this</b>	N/A
<b>When will it be mitigated?</b>	N/A
<b>How will you monitor/review or report this?</b>	<p>The policy will be reviewed and updated in line with changes to UK legislation, national Prevent guidance, and emerging evidence relating to extremist risk. Updates will be implemented where relevant to ensure continued proportionality and compliance.</p>

<b>Sexual Orientation:</b> 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:	
<b>Positive, negative or neutral impact:</b>	Neutral

**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)

<b>Positive, negative or neutral impact:</b>	Neutral
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**Privacy, dignity, respect, fairness etc:**

<b>Positive, negative or neutral impact:</b>	Neutral
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### Step Four – Assurance

<b>Title</b>	Associate Director for Safeguarding
<b>Date</b>	6/02/26

# **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.