


-Equality Impact Assessment (EQIA) Form		 GIG CYMRU NHS WALES Cydweithrediad Iechyd GIG Cymru NHS Wales Health Collaborative
Ref no:		
Name of the policy, service, scheme or project: Radiology Informatics System Procurement (RISP) Programme	Service Area RISP Programme	
Preparation		
Aims and Brief Description	<p>On 5th March 2018, the Cabinet Secretary launched the Imaging Statement of Intent (ISol), the purpose of which was to address the current challenges in diagnostic and therapeutic imaging in NHS Wales. The ISol identified Informatics & Information as a priority area with effective and high-quality informatics systems and information being critical to the delivery of a world-leading, sustainable, effective, and efficient imaging service.</p> <p>In November 2018, the Welsh Audit Office Radiology Report was published. This also identified Informatics as a priority and a key enabler to service delivery.</p> <p>Authority has been provided by the Chief Executive Group for the NHS Wales Health Collaborative to establish a Radiology Informatics System Procurement Programme (RISP) to manage the All Wales Picture Archive System (PACS) contract, supplied by Fujifilm, which is due to end.</p> <p>The RISP Programme vision is to deliver <i>“A seamless end-to-end electronic solution to meet the needs of the radiology service to deliver high quality and timely provision for all patients.”</i></p>	
Which Director is responsible for this policy/service/scheme etc	Matt John, SRO (RISP)	
Who is involved in undertaking the EQIA	Emily Jarmann, RISP Project Manager, NHSWHC Scarlett Clarke, RISP Project Manager, NHSWHC John Collins, RISP Subject Matter Expert, NHSWHC Geraint Roberts, Welsh Language Officer, NHSWHC Amanda Carter, Senior Product Specialist (RadIS), DHCW Dr. Sian Phillips, Clinical Lead (RISP), NHSWHC	
Have you consulted with stakeholders in the development of this policy?	<p>There has been significant engagement with the service with 270+ stakeholders attending meetings, workshops and roadshow events held at all HBs and Trusts across Wales and latterly via Microsoft Teams.</p> <p>The full list of stakeholder groups engaged include but not limited to:</p> <p>Radiologists, Radiographers, Trainer/ Trainees, Radiology Managers,</p>	

	<p>Administration staff, Directors of Finance, Directors of Planning, Clinical Directors, DoTHS, PACS Managers, Informatics Leads, Medical Physics, NWIS and Welsh Government.</p> <p>Workshops and roadshows took place between March 2018 and November 2020. All Health Boards and Trusts (with the exception of Powys THB, WAST, and HEIW) were engaged via a series of roadshows in January 2020. From July – September 2020 a series of scoping and technical workshops also took place with engagement from Health Boards, Trusts, Breast Test Wales, Welsh Government, the Royal College of Radiologists, and the NHS Wales Informatics Service.</p> <p>Requirements development workshops including PACS managers, clinical users, admin users, enterprise users, medical physics users and business managers are ongoing into 2021. A second round of roadshows also took place with Health Boards and Trusts across NHS Wales in April 2021.</p>
Does the policy assist services or staff in meeting their most basic needs such as; Improved Health, fair recruitment etc	<p>The programme will see the deployment of a modern and efficient IT platform for radiology services across Wales. This will:</p> <ul style="list-style-type: none"> • Enable clinical services to operate efficiently within and across organisational boundaries, reducing clinical risk and improving health outcomes for patients • Support improved access to information that enables better service planning and operational efficiency maximising the contribution of the workforce and optimising use of physical resources • Contribute to improving recruitment prospects by offering employees the opportunity to work with modern best in class software tools.
Who and how many (if known) may be affected by the policy?	<p>The RISP Programme will predominantly affect staff working in diagnostic imaging departments, and clinical and administrative staff working across the wider health system. The programme should also have a positive impact on the patient and clinical experience of diagnostic imaging services, as a result of improved pathways, efficiency and outcomes.</p>
What guidance have you used in the development of this service, policy etc?	<p>The RISP service will be procured using a competitive dialogue procurement approach, guided by an Output Based Specification (OBS) – development of the OBS has been informed by extensive stakeholder engagement as referenced above. The programme has used guidance from Managing Successful Programmes (MSP) methodology, PRINCE2 methodology, NHS Wales Health Collaborative governance policies, and procurement policies from NHS Wales Informatics Service.</p>

Equality Duties

The Policy/service/project or scheme Aims to meet the specific duties set out in equality legislation.	Protected Characteristics									Welsh Language	Carers
	Race	Sex/Gender	Disability	Sexual orientation	Religion and Belief	Age	Gender reassignment	Pregnancy and Maternity	Marriage & civil Partnerships		
To eliminate discrimination and harassment	-	✓	✓	-	-	-	✓	-	-	-	-
Promote equality of opportunity	-	-	✓	-	-	-	-	-	-	-	-
Promote good relations and positive attitudes	-	✓	✓	-	-	-	✓	-	-	-	-
Encourage participation in public life	-	-	-	-	-	-	-	-	-	-	-
In relation to disability only, should the policy/service/project or scheme take account of difference, even if involves treating some individuals more favorably?			✓								

Key	
✓	Yes
x	No
-	Neutral

Human Rights Based Approach – Issues of Dignity & Respect

The Human Rights Act contains 15 rights, all of which NHS organisations have a duty. The 7 rights that are relevant to healthcare are listed below.			
Consider is the policy/service/project or scheme relevant to:	Yes	No	N/A
Article 2: The Right to Life			✓
Article 3: the right not to be tortured or treated in a inhumane or degrading way			✓
Article 5: The right to liberty			✓
Article 6: the right to a fair trial			✓
Article 8: the right to respect for private and family life	✓		

Article 9: Freedom of thought, conscience and religion			✓
Article 14: prohibition of discrimination			✓

Measuring the Impact

What operational impact does this **policy, service, scheme or project**, have with regard to the Protected Characteristics. Please cross reference with equality duties


	Impact – operational & financial
Race	The RISP Programme is not anticipated to have an impact on protected characteristics race, sexual orientation, religious belief or non-belief, age, pregnancy and maternity, or marriage and civil partnership. The programme is focused on procurement of an informatics system which is not anticipated to impact these characteristics in reference to the equality duties. The programme is also not anticipated to have an impact on carers.
Sex/gender	
Disability	
Sexual orientation	
Religion belief and non belief	
Age	Sex/gender and gender reassignment – In June 2020, The Welsh Government's Data Standard Change Notice introduced updated national operational standards for the use of core demographics and reference data. This is the standard that new systems need to comply with, and existing systems will need to adopt by April 2022 (with some systems to be compliant by April 2023). The standards cover a range of data sets, including sex and gender identity. The RISP Programme will be compliant with the Core Data Standards as set out in the Change Notice, and will therefore have a positive impact on sex/gender and gender reassignment. Sex and gender were previously not able to be recorded separately in the existing WRIS, however under the new standards, this information will be recorded separately. This addresses the equality duty 'to eliminate discrimination and harassment' and 'to promote good relations and positive attitudes'. This is because people whose gender identity is different to their sex assigned at birth (e.g. non-binary or transgender) will be given an option to have their gender identity recorded correctly.
Gender reassignment	
Pregnancy and maternity	
Marriage and civil partnership	
Other areas	
Welsh language	Disability – There is a potential for the RISP system to have an impact on members of the workforce who have disabilities or impairments. This relates to the following equality duties <ul style="list-style-type: none"> • 'to eliminate discrimination and harassment' as there is a potential that some members of the workforce could feel discriminated against by the introduction of a system they are unable to use. • 'to promote equality of opportunity' as noted above. • 'to promote good relations and positive attitudes' as the system will be more positively received by individuals with this protected characteristic if they have been considered and accommodated. To address this impact, the system should be able to accommodate the accessibility features
Carers	

that are a feature of the underlying operating system. Any member of staff who has a disability or impairment that may impact their ability to use the system will also be accommodated under their usual workplace arrangements in line with NHS Wales workforce policies i.e. reasonable adjustments under the Equality Act 2010.

The RISP programme has considered whether the IT system is required to comply with the Welsh Language Standards by providing a Welsh interface for Welsh-speaking members of the workforce. The Welsh Language Standards state that the Welsh language should be treated no less favorably than the English language. However, there is no Welsh Language Standard specific to clinical IT systems, and therefore no legal requirement to procure an informatics system with Welsh capability. Outputs of RISP (for example, patient letters) will continue to adhere to the Welsh Language Standards. The programme therefore will have a neutral impact on Welsh language as it will maintain existing standards.

The RISP programme considered whether there was an opportunity for future strategic planning which fits into Welsh Government priorities such as [Cymraeg 2050](#), and the Welsh Language Commissioner's [Welsh language technology action plan](#), thereby encouraging participation in public life. However, it was considered there were too many risks involved around clinical risk and patient safety, and also around local informatics support. As there was no legal requirement to pursue this option, the risks outweigh any benefits.

Outcome report

Equality Impact Assessment: Recommendations Please list below any recommendations for action that you plan to take as a result of this impact assessment					 GIG Cymru NHS Wales Cydwethrediad Iechyd GIG Cymru NHS Wales Health Collaborative	
Recommendation		Action Required	Lead Officer	Time-scale	Resource implications	Comments
1	The RISP system should comply with the updated Welsh Government Data Standards	The RISP specification will be compliant with these data standards	JC	July 2021	No additional resource implications as this is included as part of the routine QA on schedule 2.1	
2	The RISP system should be compatible	The RISP specification will integrate with existing systems	JC	July 2021	No additional resource	

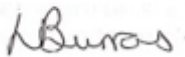
with Health Board accessibility features on underlying operating systems				implications as this is included as part of the routine QA on schedule 2.1	
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Risk Assessment based on above recommendations – if policy is approved in original format refer to grading in appendix 1

Recommendation	Likelihood	Impact	Risk Grading
1 The RISP system should comply with the updated Welsh Government Data Standards	1	1	1
2 The RISP system should be compatible with Health Board accessibility features on underlying operating systems	1	1	1
3			
4			
5			

Reputation and compromise position	Outcome
Training and dissemination of policy	

Is the policy etc lawful?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Review date
Does the EQIA group	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	

support the policy be adopted?			
Signed on behalf of RISP Programme Board		Senior Programme Manager	
Date: 30 th June 2021		Date: 01/07/2021	

Appendix 1

	Impact, Consequence score (severity levels) and examples				
	1	2	3	4	5
	Negligible	Minor	Moderate	Major	Catastrophic
Statutory duty	No or minimal impact or breach of guidance/statutory duty	Breach of statutory legislation	Single breach in statutory duty	Multiple breaches in statutory duty	Multiple breaches in statutory duty
	Potential for public concern	Formal complaint	Challenging external recommendations	Legal action certain between £100,000 and £1million	Legal action certain amounting to over £1million
	Informal complaint	Local media coverage – short term reduction in public confidence	Local media interest	Multiple complaints expected	National media interest
	Risk of claim remote	Failure to meet internal standards	Claims between £10,000 and £100,000	National media interest	Zero compliance with legislation
		Claims less than £10,000	Formal complaint expected		Impacts on large percentage of the population
		Elements of public expectations not being met	Impacts on small number of the population		Gross failure to meet national standards

LIKELIHOOD DESCRIPTION	
5 Almost Certain	Likely to occur, on many occasions
4 Likely	Will probably occur, but is not a persistent issue
3 Possible	May occur occasionally
2 Unlikely	Not expected it to happen, but may do
1 Rare	Can't believe that this will ever happen