

EQUALITY IMPACT ASSESSMENT

Section A: Assessment	
Name of Policy	IONISING RADIATION RISK MANAGEMENT POLICY
Person/persons conducting this assessment with Contact Details	<p>Name: Professor Wil Evans</p> <p>Post: Consultant Clinical Scientist (Medical Physics) – Ionising Radiation Lead</p> <p>Address: Medical Physics and Clinical Engineering, University Hospital of Wales</p> <p>Tel: 029 2074 2009</p> <p>E-mail: wil.evans@wales.nhs.uk</p>
Date	19 th August 2016
1. The Policy	
<p><i>Is this a new or existing policy?</i></p> <p>This is a complete revision of an existing policy.</p>	

What is the purpose of the policy?

The purpose of the Policy is to ensure the Cardiff and Vale University Health Board (UHB) delivers its aims, objectives, responsibilities and legal requirements transparently and consistently by using ionising radiation in a safe manner and in such a way as to protect the health and well-being of those who are exposed to ionising radiation.

How do the aims of the policy fit in with corporate priorities (i.e. the Corporate Plan)?

The Policy fits with the priorities of the integrated medium term plan by managing risks associated with the use of ionising radiation across the UHB. It provides a framework for meeting the requirements of legislation and guidance as regards such use and thus ensures regulatory compliance and conformance to health and care standards.

Who will benefit from the policy?

The primary beneficiaries of the Policy are patients, members of the public (including carers and visitors) and members of staff.

What outcomes are wanted from this policy?

The desired outcomes from the implementation of this policy are:

- Providing a robust framework for the management and safe use of ionising radiation
- Ensuring that managers and staff are aware of their roles in the safe use of ionising radiation
- Keeping radiation doses and dose rates as low as reasonably practicable (ALARP)
- Restricting the use of ionising radiation to practices that are justified and ensure that each intentional exposure of a human subject is individually justified
- Optimising exposure to ionising radiation in order to reduce radiation dose, provided that this is consistent with any desired clinical or related outcome
- Keeping radiation doses to staff and members of the public within statutory dose limits
- Managing radiation equipment in accordance with accepted best practice
- Ensuring that the use of ionising radiation is compliant with current legislation, standards and guidance
- Demonstrating compliance through record keeping and audit

- Entitling duty holders associated with the exposure of human subjects to ionising radiation
- Appointing Radiation Protection Advisers, Medical Physics Experts and Radiation Protection Supervisors

Are there any factors that might prevent outcomes being achieved (e.g. training/practice/culture/human or financial resources)?

- Acting as Radiation Protection Adviser (RPA) is a highly specialised role that requires re-certification by an external assessment body every five years. The service of a RPA is provided to the UHB by the Velindre NHS Trust under a service level agreement. However, at present there is only one person who is a certificated RPA with expertise in diagnostic and interventional radiology and in nuclear medicine, and arrangements for service continuity in the absence of this individual are unclear.
- The role of Medical Physics Expert (MPE) is also highly specialised. UHB employees act as MPEs in nuclear medicine while MPEs in diagnostic and interventional radiology are provided by the Velindre NHS Trust under a service level agreement. It is believed that there is only one person who is suitably experienced to act as MPE in diagnostic and interventional radiology and, again, arrangements for service continuity in the absence of this individual are unclear.
- The appointment of an individual member of UHB staff as Radiation Protection Supervisor (RPS) may impact upon his/her existing role and arrangements for support may be required.
- In addition to the roles of RPA and MPE as noted above, the UHB is dependent upon the Radiation Protection Service in the Velindre NHS Trust for the provision of the following services: personal and environmental radiation monitoring, quality assurance for diagnostic and interventional radiology and examination and testing of portable radiation instruments.
- As existing certificate holders retire, difficulties may be encountered in identifying doctors employed by the UHB who are suitably qualified, trained and experienced to hold certificates from the Administration of Radioactive Materials Advisory Committee (ARSAC), especially for therapeutic nuclear medicine procedures.

2. Data Collection

What qualitative data do you have about the policy relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population)?

What quantitative data do you have on the different groups (e.g. findings from discussion groups, information from comparator authorities)?

Please indicate the source of the data gathered (e.g. Concerns/Service/Department/Team/Other).

What gaps in data have you identified? (Please put actions to address this in your action plan.)

The comments below are not an exhaustive description of the available evidence and information but provide an indicative summary of evidence and information applicable to this Policy.

Proper use of ionising radiation is a requirement for the safe and effective provision of healthcare no matter what the healthcare setting. The standards established in the Policy mirror national best practice guidance and are equally applicable to all groups including those patients, carers and service users with a protected characteristic. It is believed that the impact of the implementation of this policy will be overwhelmingly positive. The policy improves standards and overall safety for all patients, carers, service users, members of staff and members of the public and is not discriminatory in any way. It requires a high standard of safety and applies to services that are provided for adults and children regardless of gender.

3. Impact

Please answer the following questions. In doing so, consider the information gathered in section 2 above of this assessment form, comparing monitoring information with census data as appropriate (see www.ons.gov.uk Office National Statistics website) and considering any other earlier research or consultation. You should also look at the guidance in Appendix 1 with regard to the protected characteristics **stating the impact and giving the key reasons for your decision.**

Do you think that the policy impacts on people because of their age? (This includes children and young people up to 18 and older people.)

No

Do you think that the policy impacts on people because of their caring responsibilities?

No

Do you think that the policy impacts on people because of their disability? (This includes visual impairment, hearing impairment, physical disability, learning disability, some mental health issues, HIV positive status, multiple sclerosis, cancer, diabetes and epilepsy.)

No
<p>Do you think that the policy impacts on people because of gender reassignment? (This includes transgender and transvestite.)</p> <p>No</p>
<p>Do you think that the policy impacts on people because of their being married or in a civil partnership?</p> <p>No</p>
<p>Do you think that the policy impacts on people because of their being pregnant or just having had a baby?</p> <p>Special attention is paid to the exposure to ionising radiation of pregnant members of staff, pregnant patients and patients who are breast-feeding for the protection of the foetus and the infant.</p>
<p>Do you think that the policy impacts on people because of their race? (This includes colour, nationality and citizenship or ethnic or national origin such as gypsy and traveller communities.)</p> <p>No</p>
<p>Do you think that the policy impacts on people because of their religion, belief or non-belief? (There is a wide range of religious groups, most of whose members are Buddhists, Christians, Hindus, Jews, Muslims or Sikhs. Consider these categories individually and collectively when considering impacts.)</p> <p>No</p>
<p>Do you think that the policy impacts on men and woman in different ways?</p> <p>In addition to issues related to pregnancy and breast-feeding, special attention is paid to the radiation safety of females of child-bearing age.</p>

<p>Do you think that the policy impacts on people because of their sexual orientation? (This includes gay men, heterosexuals, lesbians and bisexuals.)</p> <p>No</p>
<p>Do you think that the policy impacts on people because of their use of the Welsh language?</p> <p>No</p>
<p>4. Summary.</p>
<p>For which equality groups have positive or negative impacts been identified (i.e. are there differential impacts)? Is the policy directly or indirectly discriminatory under the equalities legislation? If the policy is indirectly discriminatory can it be justified under the relevant legislation?</p> <p>It is believed that the impact of this Policy will be overwhelmingly positive for all patients, carers, service users, visitors, members of staff and members of the public who may be exposed to ionising radiation as a result of its use to care for people or to keep people well. The Policy is inclusive of all care setting and sectors and establishes common standards of safety which are seamless for patients across every care pathway where ionising radiation is used. No negative impact has been identified.</p>

<p>Section B: Action</p>
<p>5. Please complete your action plan below. Issues you are likely to need to address include:</p> <ul style="list-style-type: none"> •What consultation needs to take place with equality groups (bearing in mind any relevant consultation already done and any planned corporate consultation activities) •What monitoring/evaluation will be required to further assess the impact of any changes on equality target groups?

Equalities Impact Assessment Implementation Mitigation/Action Plan

Issue to be addressed	Responsible Officer	Action Required	Timescale for completion	Action Taken	Comments

6. Report, publication and Review

Please record details of the report or file note which records the outcome of the EQIA together with any actions/recommendations being pursued (date, type of report etc.).

Please record details of where and when EQIA results will be published.

The EQIA will be published on the Cardiff and Vale UHB's intranet site alongside the Ionising Radiation Risk Management Policy.

Please record below when the EQIA will be subject to review.

The EQIA will be reviewed in parallel with the Ionising Radiation Risk Management Policy.

Name of person completing EQIA	William David Evans Consultant Clinical Scientist (Medical Physics) – Ionising Radiation Lead
Signed	
Date	

Name of Responsible Executive/Clinical Board	Fiona Jenkins Executive Director of Therapies and Health Science
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Director Authorising Assessment and Action Plan for publication	
Signed	
Date	

Executive Summary

The aim of the Ionising Radiation Risk Management Policy is to ensure that the Cardiff and Vale UHB manages its use of ionising radiation in a safe manner and in such a way as to minimise its impact on people and the environment. In order to achieve this aim, a series of objectives have been identified and practical implementation measures set out in two procedures: (1) Exposure of Patients to Ionising Radiation Procedure and (2) Exposure of Staff and Members of the Public to Ionising Radiation Procedure.

Background

The UHB uses ionising radiation for clinical and related applications and this use results in the exposure of different groups of people. Such exposure to ionising radiation has the potential to present a hazard to patients, staff and members of the public. The Ionising Radiation Risk Management Policy and associated Procedures were commissioned by the Radiation Protection Group as part of an overarching governance framework for radiation safety in order to provide assurance to the Executive Board.

The scope of the EQIA

The Policy covers the management of ionising radiation in all care settings and for all patients, service users, carers, visitors, members of staff and members of the public who may be affected by its use.

Key findings

It is believed that the impact of this Policy will be overwhelmingly positive for all patients, carers, service users, visitors, members of staff and members of the public who may be affected by ionising radiation used to care for people or to keep people well.

Recommendations

The Policy has no adverse impact on patients, carers, service users, visitors, members of staff or members of the public, including those who may have a protected characteristic, and it is recommended that the Policy should be adopted immediately.