

Equality Diversity and Inclusion Policy

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Policy title		Equality, Diversity and Inclusion Policy			
Author(s)		Andy Stevens; Patient Safety and Quality Lead			
Supporting Executive(s)		Lorna Collingwood-Burke; Chief Nursing Officer			
Supporting Executive Approval Date		1 July 2016			
Purpose of Policy	Decision				
	Assurance			✓	
	Information			✓	
FOI Status	Public			✓	
	Private				
Category of Policy	Decision				
	Position Statement			✓	
	Information			✓	
Does this document place Individuals at the Centre	Y				
Reference to other documents					
Have the legal implications been considered?	Yes				
Equality Impact Assessment					
Who does the proposed piece of work affect?	Staff			✓	
	Patients			✓	
	Carers			✓	
	Public			✓	
				Yes	No
1. Will the proposal have any impact on discrimination, equality of opportunity or relations between groups?					✓
2. Is the proposal controversial in any way (including media,					✓

academic, voluntary or sector specific interest) about the proposed work?		
3. Will there be a positive benefit to the users or workforce as a result of the proposed work?	✓	
4. Will the users or workforce be disadvantaged as a result of the proposed work?		✓
5. Is there doubt about answers to any of the above questions (e.g. there is not enough information to draw a conclusion)?		✓
If the answer to any of the above questions is yes (other than question 3) or you are unsure of your answers to any of the above you should provide further information using Screening Form One <i>available from Corporate Services</i>		
If an equality assessment is not required briefly explain why and provide evidence for the decision.		

NEW Devon CCG has made every effort to ensure this policy does not have the effect of discriminating, directly or indirectly, against employees, patients, contractors or visitors on grounds of race, colour, age, nationality, ethnic (or national) origin, sex, sexual orientation, marital status, religious belief or disability. This policy will apply equally to full and part time employees. All NEW Devon CCG policies can be provided in large print or Braille formats if requested, and language line interpreter services are available to individuals of different nationalities who require them.

Reference to Core Strategies and Corporate Objectives

Core Strategies, we will:	Corporate Objective	Does this report reference to the Core Strategies/ Corporate Objectives	
		✓	X
1. Take joint ownership with partners and the public for creating sustainable health and care services	1.1 Develop people, and those who support them, to value strengths and personal qualities in all that they do	✓	
	1.2 Listen to people and take action on what they say about services	✓	
2. Implement systems that make the best use of valuable health resources, every time	2.1 Innovate to increase productivity and reduce waste	✓	
	2.2 Commission safe	✓	

	services and reduce avoidable harm	
3. Commission to prevent ill health, promote well being and help people with long-term conditions to live well	3.1 Support people to make healthy lifestyle choices and understand the care, treatment and services available to them	✓
	3.2 Commission services with partners to reduce health inequalities and improve people's lives	✓

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DOCUMENT CHANGE HISTORY		
Version:	Date:	Comments (i.e. viewed, or reviewed, amended, approved by person or committee)
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2.0	27.09.2013	Reviewed by Jenny Winslade and Lorna Collingwood-Burke and amended accordingly
3.0	02.09.2013	Approved by Jenny Winslade
4.0	05.2016	Reviewed and amended by Andy Stevens
5.0	06.2016	Reviewed and updated by staff forum and colleagues in other teams and directorates. Changes and updates made in document.
6.0	14.06.2016	Reviewed and approved by Staff Forum.
8.0	03.08.2016	Reviewed and approved by Exec Committee
Authors:	Andy Stevens; Patient Quality and Safety Lead	
Scrutinised by: (name & title)	Staff forum 14.06.16 Exec Committee 03.08.16	
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Linked strategies, policies and other documents	<p>All NHS NEW Devon CCG policies make explicit links with regard to Equality, Diversity and Inclusion. Policies include:</p> <ul style="list-style-type: none"> • Dignity at Work Policy • Time Off Policy • Recruitment and Selection Policy • Disciplinary Policy • Grievance policy • Communications and Engagement Strategy • Patient Advice and Complaints Policy • Sickness Absence and Staff Wellbeing policy • Procurement Policy • Standards of Business Conduct Policy • Code of Practice for Confidentiality Policy • PREVENT Policy • Safeguarding Policies
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1. Introduction

- 1.1 The purpose of this policy is to provide staff within NHS Northern, Eastern and Western Devon Clinical Commissioning Group (NHS NEW Devon CCG) with a framework to ensure that Equality, Diversity, Inclusion and Human Rights legislation is embedded within the Clinical Commissioning Group and to ensure there are defined guidelines for patients, employees and visitors to follow. NHS NEW Devon CCG has a statutory duty to ensure that the organisation promotes and implements Equality, Diversity and Inclusion.
- 1.2 The organisation is committed to equality of opportunity for all, recognises the need to ensure we eliminate discrimination, advance equality of opportunity and foster good relations and eliminate employment discrimination due to age, disability, gender reassignment, maternity/pregnancy, race, religion, belief, sex, sexual orientation, physical/mental and marital or civil partnership status.
- 1.3 Equality of opportunity means that an individual's diversity is viewed positively and values the contribution that an individual's experience, knowledge and skills can make and barriers to participation are removed.
- 1.4 The purpose of this policy is to ensure that this happens within the organisation and within the services we commission on behalf of our local population.

2. Aims

- 2.1 To be an organisation that leads the promotion of Equality, Diversity and Inclusion.
- 2.2 To be an organisation that challenges discrimination and promotes equality, diversity and inclusion in service delivery and employment.
- 2.3 To create an organisation which recognises the contribution of all employees, and which is supportive, fair and free from discrimination.
- 2.4 To encourage staff to develop their awareness and respond to the diverse needs of service users.
- 2.5 To ensure NHS NEW Devon CCG is regarded as an exemplar employer

3. Objectives

- 3.1 To enable all people within Northern, Eastern and Western Devon the ability to access services, facilities and information.

- 3.2 To enable all NHS NEW Devon CCG staff to be able to achieve their full potential in an environment characterised by dignity and mutual respect.
- 3.3 To enable everyone who works for NHS NEW Devon CCG, or applies to work for the organisation, to be treated fairly and valued equally.
- 3.4 To make equality, diversity and inclusion a part of everything that NHS NEW Devon CCG does.
- 3.5 To comply with, and build on, the current legal framework through the establishment of good practice in all aspects of employment and service provision.

4. Legislation and our legal responsibility

- 4.1 Under the Equality Act 2010, NHS NEW Devon CCG as a public body has legal obligations to;
 - Eliminate discrimination, harassment, victimisation and other prohibited conduct.
 - Advance equality of opportunity.
 - Foster good relations between people.
 - Publish objectives to demonstrate the points listed above and information on our performance.
 - Make reasonable adjustments.
- 4.2 Reasonable Adjustment is a legal term initially introduced under the Disability Discrimination Act 1995. It requires that an employer has a statutory duty to make 'reasonable adjustments' to ensure that disabled people can fully participate in society. Reasonable adjustments could include a change to a policy or practice, removing a physical barrier, providing an auxiliary aid or providing a service in an alternative way.
- 4.3 The Equality Act 2010 simplifies, strengthens and harmonises the current legislation to provide Britain with a new discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society.
- 4.4 The nine main pieces of legislation that have merged are:
 - The Equal Pay Act 1970.
 - The Sex Discrimination Act 1975.
 - The Race Relations Act 1976.
 - The Disability Discrimination Act 1995.
 - The Employment Equality (Religion or Belief) Regulations 2003.
 - The Employment Equality (Sexual Orientation) Regulations 2003.
 - The Employment Equality (Age) Regulations 2006.

- The Equality Act 2006, Part 2.
- The Equality Act (Sexual Orientation) Regulations 2007(EHRC)¹.

4.5 The Equality Act also includes the Public Sector Equality Duty which replaces the separate duties relating to Race, Gender and Disability.

4.6 There are nine 'protected characteristics'² which are referenced in the Equality Act 2010. These are:

- **Age:**
Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18-30 years old).
- **Disability:**
A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
- **Gender reassignment:**
The process of transitioning from one gender to another.
- **Marriage and civil partnership**
In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple.
Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act)
- **Pregnancy and Maternity:**
Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
- **Race:**
A group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins.

¹What is the Equality Act? *Equality and Human Rights Commission*. Available at; <http://www.equalityhumanrights.com/legal-and-policy/equality-act/what-is-the-equality-act/> (accessed: 24th April 2013)

²Protected Characteristics definitions. *Equality and Human Rights Commission*. Available at; <http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/> (Accessed: 24th April 2013)

- **Religion and belief:**
Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live it to be included in the definition.
- **Sex:**
A man or woman
- **Sexual Orientation**
Whether a person's sexual attraction is towards their own sex, the opposite sex to both sexes.

4.7 Local Characteristics

The following local characteristics have been identified by NHS NEW Devon CCG and will also need to be taken into consideration (along with the 'protected characteristics' noted above). These local characteristics are;

- Asylum seekers and refugees
- Gypsies and Travellers
- Economically Deprived
- Rurally Isolated

5. Definitions

- 5.1 **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.
- 5.2 **Equality:** Is the state of being equal, having the same rights, opportunities and status. NHS NEW Devon CCG is committed to equality for their patients, communities and staff.
- 5.3 **Inclusion:** People should freely, openly and without pity accommodate any person with a disability without restrictions or limitations of any kind.
- 5.4 The Equality Act 2010 also extends some of these protections to characteristics that previously were not covered by equality legislation.
- 5.5 There are eight different types of discrimination under the new legislation. These are:
1. **Direct discrimination:** Where someone is treated less favourably than another person because of a protected characteristic.

2. **Associative discrimination:** This already applies to Race, Religion or Belief and Sexual Orientation. It is now extended to cover Age, Disability, Gender Reassignment and Sex. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
3. **Perspective Discrimination:** This already applies to Age, Race, Religion or Belief and Sexual Orientation. It is now extended to cover Disability, Gender reassignment and Sex. This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess the characteristic.
4. **Discrimination by perception:** This is direct discrimination against someone because others think that they possess a particular protected characteristic. They do not necessarily have to possess the characteristic, just be perceived to.
5. **Indirect discrimination:** This can occur when there is a rule or policy that applies to everyone but disadvantages a person with a particular protected characteristic.
6. **Harassment:** This is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”. Employees will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and association.
7. **Third Party Harassment:** This already applies to Sex. It is now expected to cover Age, Disability, Gender Reassignment, Race, Religion or Belief and Sexual Orientation. The Equality Act makes you potentially liable for harassment of your employees by people (third parties) who are not employees of your company, such as customers or clients.
8. **Victimisation:** This occurs when someone is treated badly because they have made or supported a complaint or grievance under the Equality Act; or because they are suspected of doing so. The Equality Act amends the definition ‘victimisation’, so that it no longer needs to point to a comparator.

5.6 Human Rights:

The Human Rights Act 1998³ sets universal standards to ensure that a person's basic needs as a human being are recognised and met. These include:

- The right to life
- The right not to be tortured or treated in an inhuman or degrading way
- The right to liberty
- The right to a fair trial
- The right to respect private and family life, home and correspondence
- The right not to be discriminated against

5.7 Public Sector Equality Duty (PSED):

The Public Sector Equality Duty (the Equality Duty) was created by the Equality Act 2010 in order to harmonise the previous race, disability and gender equality duties and to extend protection to the new protected characteristics listed in the Act.

5.8 The Equality Duty replaced these duties and it came into force on 05 April 2011.⁴

5.9 The general duty requires NHS organisations to have due regard to:

- Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act.
- 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.⁵

³Human Rights Act 1998. Available at; <http://www.legislation.gov.uk/ukpga/1998/42/schedule/1> (Accessed 24th April 2013)

⁴The Public Sector Equality Duty. Available at; <http://www.equalityhumanrights.com/about-us/equality-and-diversity/the-public-sector-equality-duty/> (Accessed 24th April 2013)

⁵ Public Sector Duty, *NHS Employers*, Available at: <http://www.nhsemployers.org/EmploymentPolicyAndPractice/EqualityAndDiversity/EqualityAct/Pages/ConsultationOnThePublicSectorEqualityDuty.aspx> (Accessed 9th July 2013)

6. Responsibilities

6.1 Provider Responsibilities:

- 6.1.1 NHS NEW Devon CCG has an Equality, Diversity and Inclusion expectation within the quality schedule to include specific equality and diversity performance indicators to assure compliance with statutory responsibilities, and the use of equality impact assessments when planning changes in service provision.

6.2 Clinical Commissioning Group:

- 6.2.1 Clinical Commissioning Groups are responsible for commissioning the majority of healthcare services. NHS NEW Devon CCG will not discriminate unlawfully against patients, carers or guardians using or seeking to use services, facilities or information provided or commissioned by NHS NEW Devon CCG.
- 6.2.2 NHS NEW Devon CCG aims to avoid all unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.
- 6.2.3 The organisation also has a responsibility to make *reasonable adjustments* where arrangements disadvantage an individual because of a disability and reasonable adjustments should be made to overcome the disadvantage.

6.3 Governing Body and Executive Team:

- 6.3.1 Will work within the aims set out in NHS Constitution in relation to Equality, Diversity, Inclusion and Dignity at work and to demonstrate this commitment in policies, decision making and any actions taken.
- 6.3.2 The Chief Nursing Officer is NHS NEW Devon CCG's executive lead responsible officer for Equality, Diversity and Inclusion. This role is delegated to the Chief Nursing Officer by NHSNEW Devon CCG Accountable Officer who has overall accountability for Equality, Diversity and Inclusion.

6.4 Line Managers:

(This includes Managing Directors, Heads of Service and Managers with line management responsibility)

- 6.4.1 Will ensure all employees are made aware of all policies relating to Equality, Diversity and Inclusion and Dignity at Work and their duties and responsibilities.
- 6.4.2 Will consider all service users, particularly those with protected characteristics, when considering a service change and pursue

timely engagement which will allow completion of a Quality Equality Impact Assessment (QEIA).

- 6.4.3 Will ensure fair and equal treatment of all employees, and job applicants.
- 6.4.4 Will treat seriously, and take appropriate action, in dealing with alleged claims of bullying, harassment or discrimination.
- 6.4.5 Will attend mandatory training and briefings to ensure personal updating and understanding of Equality, Diversity and Inclusion, bullying and harassment responsibilities and other statutory duties.
- 6.4.6 Will treat all disclosures, including personal and/or workforce information, reports of discrimination, bullying, victimisation and harassment as confidential and in accordance to the data protection act.

6.5 Head of Human Resources & Organisational Development:

- 6.5.1 Will monitor implementation of the policy in relation to employment activities and policy application.
- 6.5.2 Will provide regular monitoring reports against the equality duties in relation to the above.
- 6.5.3 Will ensure all Human Resources policies undergo a rapid equality impact assessment to screen for adverse and positive impact in order to address areas of concern.
- 6.5.4 Will treat all disclosures, including personal and/or workforce information, reports of discrimination, bullying, victimisation and harassment as confidential and in accordance to the data protection act.

6.6 Equality and Diversity Manager:

- 6.6.1 Will support NHS NEW Devon CCG with setting and achieving equality objectives.
- 6.6.2 Will manage and report on the equality action plan.
- 6.6.3 Will develop and implement Equality, Diversity and Inclusion training at all levels in partnership with Human Resources.
- 6.6.4 Will work with senior managers and team leaders to ensure that they are achieving their equality objectives.
- 6.6.5 Will ensure that equality impact assessments are proportionate and meaningful.

- 6.6.6 Will build and maintain relationships with other stakeholders.
- 6.6.7 Will ensure NHS NEW Devon CCG actively engages and obtains feedback from service users, staff and other stake holders on how the organisation is performing with respect to promoting equality and eliminating discrimination.

6.7 Employees:

- 6.7.1 Will be required to assist NHS NEW Devon CCG to meet its commitment to provide equal opportunities in employment and to avoid unlawful discrimination.
- 6.7.2 Have a responsibility to attend and undertake Equality and Diversity Training as part of their mandatory training and when instructed to by NHS NEW Devon CCG.
- 6.7.3 Should understand that they can be held personally liable as well as, or instead of NHS NEW Devon CCG, for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence and will be subject to disciplinary proceedings against them.
- 6.7.4 Have a responsibility to report anything that they think may be perceived as discriminatory, bullying, victimisation or harassment to their line manager or a member of the HR team.

6.8 Acceptable behaviours:

- 6.8.1 NHS NEW Devon CCG expects all employees to:
- Treat everyone with dignity and respect, in line with the Dignity at Work Policy
 - Treat people fairly and according to their needs without making assumptions.
 - Be patient and helpful, particularly if someone has difficulties communicating, understanding or difficulties with mobility.
 - Communicate clearly.
 - Be courteous and polite.
 - Respect property and culture particularly when visiting people in their own places.
 - Respect the right to private and family life.
 - Think about how actions will affect others.
 - Be aware of the effects of behaviour and body language on others.
 - Recognise and guard personal prejudices.

- Ensure they do not act in a way that would humiliate, offend, degrade, intimidate, frighten, threaten, undermine or abuse someone.
- Ensure they do not promote or allow others to act in this way.
- Ensure they do not use language or images which would be regarded as racist, sexist, homophobic, transphobic or insulting about disability, age, or religion and belief.
- Ensure they do not promote or allow others to act in this way.

6 Compliance with the Equality Act

7.1 Policy:

7.1.1 This policy will be reviewed by the Equality Reference Group and approved by NHS NEW Devon CCG Governing Body. It will be monitored annually by NHS NEW Devon CCG to determine its effectiveness and to ensure that the organisation is compliant with statutory duties.

7.1.2 The policy will be updated in accordance with changes in the law and will be done through consultation with local groups and the staff forum and ratified by the Executive Committee.

7.2 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 dealt with in accordance with the Data Protection Act 1998. This includes information which is collected by HR to inform the Workforce report. Workforce reports are required under the Public sector equality duty and will demonstrate equality within NHS NEW Devon CCG's workforce.

7.3 Discrimination:

Any acts of discrimination, harassment, bullying or victimisation against employees or patients are disciplinary offences and will be dealt with under NHS NEW Devon CCG's Disciplinary Procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

7.4 Equality Delivery System:

NHS NEW Devon CCG will use the Equality Delivery System (EDS) tool kit which is designed to help commissioners deliver better outcomes to communities, patients and an improved working environment for staff. As an NHS organisation NHS NEW Devon CCG will use the Equality Delivery

System to establish goals and outcomes as well as evidencing how we meet these.

7.5 Quality and Equality Impact Assessments:

7.5.1 Quality and Equality Impact Assessments (QEIA) are tools used to assess policies or services to establish how they may impact on individuals, communities or equality groups.

7.5.2 It involves using equality information and results from engagement with protected groups to understand the effect or potential effect to functions, policies and decisions.

7.5.3 Under the Equality duty, NHS NEW Devon CCG will publish evidence of any of the analysis that they undertake. NHS NEW Devon CCG will embed Equality Impact Assessments in all of its policies and board papers.

7.5.4 Managers responsible for service redesign and change will be accountable for completing equality assessments and should be able to evidence against the three public sector equality general duties:

- Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act.
- 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.⁶

7.6 Communications:

7.6.1 NHS NEW Devon CCG will actively take steps to ensure that information is accessible to service users, staff and other stakeholders; this will include making many publications easy to read and others on application. Publications will be in accordance with NHS NEW Devon CCG's communications guidance on font size, contrast and typeface. 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.

⁶ Public Sector Equality Duty, *NHS Employers*, Available at:<http://www.nhsemployers.org/EmploymentPolicyAndPractice/EqualityAndDiversity/EqualityAct/Page/ConsultationOnThePublicSectorEqualityDuty.aspx>(Accessed 9th July 2013)

7.6.2 NHS NEW Devon CCG is able to organise documents in different formats: Braille, large print, audio, different language and easy read. For events, we can also organise hearing loop, speech to text, and translator. Anyone wanting to organise any of these should contact the CCG communications team on d-ccg.corporateservices@nhs.net

7.7 Policy Links:

7.7.1 All NHS NEW Devon CCG policies make explicit links with regard to Equality, Diversity and Inclusion. Some specific reference policy links include:

- Dignity at Work Policy
- Time Off Policy
- Recruitment and Selection Policy
- Disciplinary Policy
- Grievance Policy
- Communications and Engagement Strategy
- Patient Advice and Complaints Policy
- Sickness Absence and Staff Wellbeing policy
- Procurement Policy
- Standards of Business Conduct Policy
- Code of Confidentiality Policy

7.7.2 All are accessible via the staff intranet site; alternatively please contact the HR team on newdevonhr@nhs.net

8 Where to go if you need advice

8.1 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 HR team
- Employees also have the support of trade unions or employee representatives
- Colleagues can also access coaches; members of staff who have been trained to support others in the organisation.

8.2 Patients, carers or families who feel that they have been a victim of discrimination or harassment, by a member of staff, are able to raise a concern or complaint through the Patient Advice and Complaints Team (PACT)

9 Accessible Information

- 9.1 The accessible information standard directs and defines a specific, consistent approach to identify, recording, flagging, sharing and meeting the information and communication support needs of patients, service users, carers and parents, where those needs relate to a disability, impairment or sensory loss.
- 9.2 It is of particular relevance to individuals who are blind, deaf, deafblind and/or who have a learning disability, although it will support anyone with information or communication needs relating to a disability, impairment or sensory loss, for example people who have aphasia or a mental health condition which affects their ability to communicate.
- 9.3 NHS NEW Devon CCG will ensure a consistent approach to identifying, recording, flagging and sharing and meeting the information and communication support needs of patients, service users, carers and parents, where those needs relate to a disability, impairment or sensory loss.
- 9.4 NHS NEW Devon CCG will ensure that contracts, frameworks and performance-management arrangements with provider bodies enable and promote the Standard's requirements.