

Joint Comprehensive Impact Analysis (JCIA) Draft v0.2 - (replaces the previous CC CIA and NHS Kernow Equality Impact Assessment)					
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Person/s responsible for the assessment				Nicky Hughes, Elective Care Programme Lead	
Lead organisation				NHS Kernow	
Name of policy/service to be assessed	Assisted Conception (existing) (criteria based access policy) Botox Injection for the Ageing Face (existing) (not routinely commissioned policy) Complex and Specialised Metabolic and Bariatric Surgery (existing) (criteria based access policy) Direct Access DXA Scanning to Help Target Treatment in Adults at Potential Risk of Osteoporotic (Fragility) Fracture (new) (criteria based access policy) Enhanced External Counterpulsation for Patients with Severe Ischaemic Heart Disease (new) (not routinely commissioned policy) Face Lift or Brow Lift (existing) (not routinely commissioned policy) Haemorrhoid Surgery (existing) (criteria based access policy) Hernia Management and Repair in Adults (existing) (criteria based access policy) Hip Impingement Syndrome (existing) (criteria based access policy) Hyperbaric Oxygen Therapy (existing) (not routinely commissioned policy) Multifocal Intraocular Lenses in Treatment of Adults with Cataracts (new) (not routinely commissioned policy) Musculoskeletal Corticosteroid Injections (existing) (criteria based access policy) One-Step Nucleic Acid Amplification as an Intra-Operative Diagnostic Method for Detecting Metastasis in Breast Cancer (new) (criteria based access policy) Resurfacing Procedures: Dermabrasion, Chemical Peels and Laser Treatment (existing) (not routinely commissioned policy) Sperm Washing (existing) (criteria based access policy) Spinal Cord Stimulation for Chronic Pain (new) (criteria based access policy) Surgical Correction of Strabismus or Amblyopia in Adults (new) (criteria based access policy) Varicose Veins Interventions (existing) (criteria based access policy) Venous Angioplasty for Multiple Sclerosis (existing) (not routinely commissioned policy) Vitreous Floaters (new) (not routinely commissioned policy)	Date of assessment	15/06/2018 Updated - 09/12/2019	Is this a new or existing policy/service?	New/Existing
1. General Background Information:					
1.1 Reason for undertaking JCIA					
Change to policy/procedures		New commissioning policies have been developed/existing commissioning policies were due to be reviewed.			
1.2 What is the purpose of the policy/service change/development					
Change to policy/procedures		New commissioning policies have been developed/existing commissioning policies were due to be reviewed, therefore, needed to ensure that NHS Kernow fund treatment only for clinically effective interventions delivered to the right patients.			
1.3 Anticipated timetable for decision					
Less than 1 month					
1.4 What areas will this impact?					
Cornwall wide		Will also impact the Isles of Scilly.			
1.5 Which of the Strategic Objectives does this JCIA apply to?					
All three		To ensure that NHS Kernow fund treatment only for clinically effective interventions delivered to the right patients. NHS Kernow sets out the treatments deemed to be of insufficient priority to justify funding from the available fixed budget. The commissioning policies will be kept under regular review, to ensure that they reflect developments in the evidence base regarding clinical and cost effectiveness.			
1.6 What are the commissioning arrangements?					
Solo health		Commissioners, General Practitioners, service providers and clinical staff treating adults of Cornwall and the Isles of Scilly will implement these commissioning policies.			
1.7 Who implements the policy/service?					
Acute health		Planned Care Programme.			
1.8 Who benefits/is intended to benefit from this policy/service? Please give age and brief description of cohort					
All adult patients registered with a GP practice in Cornwall and the Isles of Scilly will be able to access treatment if they meet the commissioning policies patient eligibility criteria, policies can be found here: https://www.kernowccg.nhs.uk/get-info/individual-funding-requests/treatment-policies/ However, if the policy is not routinely commissioned, requests for individual funding will not normally be considered, unless the circumstances fulfil the strict criteria for exceptionality as defined within the current policy for determining Individual Funding Requests (IFR), in which case they may be submitted for consideration with the framework and process outlined in the IFR policy (available here: www.kernowccg.nhs.uk/get-info/individual-funding-requests/). The following data is available: Assisted Conception - From 1 April 2018 to 30 September 2019 (existing) - 92 specialist assisted conception procedures performed Botox Injection for the Ageing Face - From 1 April 2018 to 30 September 2019 (existing) - 12 adults have had the procedure Complex and Specialised Metabolic and Bariatric Surgery (existing) - From 1 April 2018 to 30 September 2019 - 150 adults have had the procedure Direct Access DXA Scanning to Help Target Treatment in Adults at Potential Risk of Osteoporotic (Fragility) Fracture (new) - No appropriate codes to allow monitoring of this policy Enhanced External Counterpulsation for Patients with Severe Ischaemic Heart Disease (new) - No appropriate codes to allow monitoring of this policy Face Lift or Brow Lift (existing) - From 1 April 2018 to 30 September 2019 - 5 adults have had the procedure Haemorrhoid Surgery (existing) - From 1 April 2018 to 30 September 2019 - 138 adults have had the procedure Hernia Management and Repair in Adults (existing) - From 1 April 2018 to 30 September 2019 - 2039 adults have had the procedure Hip Impingement Syndrome (existing) - From 1 April 2018 to 30 September 2019 - 2668 adults have had the procedure Hyperbaric Oxygen Therapy (existing) - From 1 April 2018 to 30 September 2019 - 0 adults have had the procedure Multifocal Intraocular Lenses in Treatment of Adults with Cataracts (new) - From 1 April 2018 to 30 September 2019 - 5868 adults have had the procedure Musculoskeletal Corticosteroid Injections (existing) - From 1 April 2018 to 30 September 2019 - 54 adults have had the procedure One-Step Nucleic Acid Amplification as an Intra-Operative Diagnostic Method for Detecting Metastasis in Breast Cancer (new) - From 1 April 2018 to 30 September 2019 - No appropriate codes to allow monitoring of this policy Resurfacing Procedures: Dermabrasion, Chemical Peels and Laser Treatment (existing) - From 1 April 2018 to 30 September 2019 - 3 adults have had the procedure Sperm Washing (existing) - No appropriate codes to allow monitoring of this policy Spinal Cord Stimulation for Chronic Pain (new) - From 1 April 2018 to 30 September 2019 - 30 adults have had the procedure Surgical Correction of Strabismus or Amblyopia in Adults (new) - From 1 April 2018 to 30 September 2019 - 9 adults have had the procedure Varicose Veins Interventions (existing) - From 1 April 2018 to 30 September 2019 - 825 adults have had the procedure Venous Angioplasty for Multiple Sclerosis (existing) - From 1 April 2018 to September 2019 - 0 adults have had the procedure Vitreous Floaters (new) - From 1 April 2018 to September 2019 - 355 adults have had the procedure Where patients do not meet the exception criteria, these can be determined from secondary uses service (SUS) data, but these may still meet the permitted criteria, but an audit would need to be undertaken.					
1.9 What Health and Social Care outcomes are achieved/wanted from this policy/service?					
Support lifelong wellbeing		Supports access to treatment if the adults meet the patient eligibility criteria.			
1.10 How will/are the above monitored?					
Data on request		Data will be requested through NHS Kernow's business and intelligence team and presented to the Elective Care Team Meeting (including clinicians).			
1.11 Who are the main stakeholders in relation to the policy/service?					
Patients		Adults are the main stakeholders for these commissioning policies. Other stakeholders include RCHT, PHNT and General Practices.			
1.12 Is there clinical evidence for effectiveness of the service/policy?					
Yes, national		These commissioning policies are available from other Clinical Commissioning Groups in the South West, therefore, NHS Kernow has developed these commissioning policies to align with them.			
1.13 Does this policy/service link to Health and Social Care overall strategy for the next 5 years (2015 - 2020) and current direction of travel for Integrated Communities?					
Yes, partly		Part of the Five Year Forward view: "Some parts of the country will be able to continue commissioning and providing high quality and affordable health services using their current care models, and without any adaptation...However, previous versions of local 'five year plans' by provider trusts and CCGs suggest that many areas will need to consider new options if they are to square the circle between the desire to improve quality, respond to rising patient volumes, and live within the expected local funding".			
2. Engagement					
2.1 How have you engaged stakeholders in gathering or testing the evidence available?					
Other		Commissioning policies were shared through email with the Citizens Advisory Panel, Elective Care Clinical Leads, Referral Management Service GP Sifters, Public Health, GP Practices in Cornwall and the Isles of Scilly and Secondary Care Clinicians to review. Face to face meetings took place as required.			
2.2 What is the experience of individuals who access the service?					
Neutral					
2.3 How have you engaged stakeholders in testing the policy/service proposals?					

Other		Commissioning policies were shared through email with the Citizens Advisory Panel, Elective Care Clinical Leads, Referral Management Service GP Sifters, Public Health, GP Practices in Cornwall and the Isles of Scilly and Secondary Care Clinicians to review. Face to face meetings took place as required.	
2.4 For each engagement activity, please state who was involved, how and when they were engaged, and the key outputs			
Elective Care Clinical Leads, Referral Management Service GP Sifters, Public Health, GP Practices in Cornwall and the Isles of Scilly and Secondary Care Clinicians, through email, and face to face meetings as required. Comments and feedback received were considered before final commissioning policy amended. The commissioning policies were also shared through email with the Citizens Advisory Panel who advised that they can only comment on process rather than content, as unable to provide a clinical opinion.			
3. Impact Upon Access to Services			
Aspect	+ or - impact	Details	Plans to minimise negative impact
Eligibility of people to receive the service	Negative	Patients will need to meet the patient eligibility criteria. No previous commissioning policy in place, therefore, new policy means restrictions introduced. Other commissioning policies have been strengthened where clinically necessary.	Will continue to actively review when and why referrals are rejected, any correspondence (or complaints) received, activity levels and any unintended consequences of these policies on a regular basis. We will also continue to monitor the national situation to ensure the policies and procedures are in line with national best practice and guidance.
Ability of people to access the service	Negative	Patients will need to meet the patient eligibility criteria. No previous commissioning policy in place, therefore, new policy means restrictions introduced. Other commissioning policies have been strengthened where clinically necessary.	Will continue to actively review when and why referrals are rejected, any correspondence (or complaints) received, activity levels and any unintended consequences of these policies on a regular basis. We will also continue to monitor the national situation to ensure the policies and procedures are in line with national best practice and guidance.
Waiting times to receive service	Neutral	New or revised commissioning policy will not directly affect the waiting time to receive the service. Target is still 18 weeks.	
Longer term sustainability of the service	Negative	Patients will need to meet the patient eligibility criteria. No previous commissioning policy in place, therefore, new policy means restrictions introduced. Other commissioning policies have been strengthened where clinically necessary.	Will continue to actively review when and why referrals are rejected, any correspondence (or complaints) received, activity levels and any unintended consequences of these policies on a regular basis. We will also continue to monitor the national situation to ensure the policies and procedures are in line with national best practice and guidance.
Reducing health inequalities	Neutral	All patients treated equally against the patient eligibility criteria.	
4. Impact upon Quality of Services			
Aspect	+ or - impact	Details	Plans to minimise negative impact
Clinical performance/outcomes	Neutral	Providers are expected to undertake procedures as according to NICE guidance and national performance and outcome targets.	
Statutory NHS targets	Neutral	18 weeks target still applies. It will be expected that patients will be seen within the agreed referral to treatment timelines.	
Patient Choice	Neutral	Patients will continue to have choice of provider through the Referral Management Service.	Assisted Conception policy relates to access to infertility treatment i.e tertiary services for those who have identified fertility problems. These services are accessed via referral from secondary care. Couples will be offered a choice of designated providers that have been commissioned by NHS Kernow. Providers who are not directly commissioned by NHS Kernow must seek prior approval before assessing and treating the couples to ensure couples meet the commissioning policy criteria.
Cohesion with wider services	Neutral	Patients will continue to have access to ancillary services where deemed necessary.	
Operational effectiveness	Neutral	No impact identified.	
5. Impact Upon Patients and Carers			
Aspect	+ or - impact	Details	Plans to minimise negative impact
Patient care standards	Neutral	Providers are expected to undertake procedures as according to NICE guidance and national performance and outcome targets.	
Patient safety	Neutral	Providers are expected to follow all clinical safety guidelines in line with NHS constitution.	
Privacy and dignity	Neutral	No impact identified.	
Patient care journey/pathway	Negative	Those that qualify will see no impact to patient care journey/pathway. For those not eligible pathway may stop.	Will continue to actively review when and why referrals are rejected, any correspondence (or complaints) received, activity levels and any unintended consequences of these policies on a regular basis. We will also continue to monitor the national situation to ensure the policies and procedures are in line with national best practice and guidance.
Patient experience	Negative	Those that qualify will see no impact to patient experience. For those not eligible patient experience will be severely impacted.	Will continue to actively review when and why referrals are rejected, any correspondence (or complaints) received, activity levels and any unintended consequences of these policies on a regular basis. We will also continue to monitor the national situation to ensure the policies and procedures are in line with national best practice and guidance.
Carer experience	Negative	Those that qualify will see no impact to carer experience. For those patients not eligible carer experience will be severely impacted.	Will continue to actively review when and why referrals are rejected, any correspondence (or complaints) received, activity levels and any unintended consequences of these policies on a regular basis. We will also continue to monitor the national situation to ensure the policies and procedures are in line with national best practice and guidance.
Psychological	Negative	Those that qualify will see no psychological impact as a result of the policy changes. For those patients not eligible there may be negative psychological effect.	Will continue to actively review when and why referrals are rejected, any correspondence (or complaints) received, activity levels and any unintended consequences of these policies on a regular basis. We will also continue to monitor the national situation to ensure the policies and procedures are in line with national best practice and guidance. Adults must also be aware of the mental health services and psychological support/counselling services that are available to them.
6. Impact Upon Wider Community			
Aspect	+ or - impact	Details	Plans to minimise negative impact
Local economy	Neutral	No impact identified.	
Transport	Neutral	No impact identified.	
Community safety/crime and disorder	Neutral	No impact identified.	
Environment	Neutral	No impact identified.	
Social Care	Neutral	No impact identified.	
Cohesion with community strategy	Neutral	No impact identified.	
Technology	Neutral	No impact identified.	
Safeguarding	Neutral	No impact identified.	
Information management	Neutral	No impact identified.	
Rural isolation	Neutral	No impact identified.	
7. Impact Upon Wider System Partners - Has consideration been given to sharing proposed changes with the Systems Resilience Group and Weekly Senior Operational Group?			
Aspect	+ or - impact	Details	Plans to minimise negative impact
Primary Care	Negative	By limiting the procedures some patients will need to be managed in primary care.	Clear referral guidelines in line with the policies will manage GP expectations pre-referral and therefore reduce unexpected demand.
Kernow Health CIC	Neutral	No impact identified.	
Cornwall 111 Integrated Urgent Care Service	Neutral	No impact identified.	
SWASFT 999	Neutral	No impact identified.	
EZEC Transport	Neutral	No impact identified.	
RCHT	Positive	Some procedures may see a reduction in demand. This may be a positive impact in increasing capacity for those procedures that do qualify.	
UHP	Positive	Some procedures may see a reduction in demand. This may be a positive impact in increasing capacity for those procedures that do qualify.	
Care Homes	Neutral	No impact identified.	
Domiciliary Care Providers	Neutral	No impact identified.	

Hospice Providers	Neutral	No impact identified.	
Cornwall Foundation Trust	Positive	May see a reduction in demand for musculoskeletal corticosteroid injections. This may be a positive impact in increasing capacity for those procedures that do qualify.	
Other System Partners - please specify and add lines as necessary	N/A	No impact identified.	
8. Impact on protected characteristics			
Aspect	+ or - impact	Details	Plans to minimise negative impact
Race: Consider people's race, colour and nationality. Including Gypsy, Roma, Traveller communities, refugees, asylum seekers, ethnic minorities, language barriers	Neutral	There is no evidence requests for these procedures are linked to race; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of race. An assessment will be considered for bariatric surgery for people of Asian family origin who have recent-onset type 2 diabetes at a lower BMI than other populations as long as they are also receiving or will receive assessment in a tier three service (or equivalent).	
Sex: Consider men and women (potential to link to carers below).	Neutral	There is no evidence requests for these procedures are linked to sex; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of sex. The eligibility of sperm washing is normally indicated for couples who wish to have a child where the male is HIV-positive and the female is HIV-negative, or to minimise the risk of transmission of resistant virus in HIV seroconcordant couples. The use of sperm washing has also been proposed in couples where the male is hepatitis C positive and the female is negative. Sperm washing is not funded by the NHS for couples where the male is hepatitis C positive, because NICE CG156 recommends that couples who want to conceive and where the man is hepatitis C should be advised that the risk of transmission through unprotected sexual intercourse is thought to be low.	
Disability: Consider attitudinal, physical and social barriers. This can include physical disability, learning disability, people with long term conditions, communication needs arising from a disability.	Neutral	There is no evidence requests for these procedures are linked to disability; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of disability.	
Sexual orientation: Consider heterosexual people as well as lesbian, gay and bisexual people.	Neutral	There is no evidence requests for these procedures are linked to sexual orientation; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of sexual orientation. Same Sex couples unable to conceive naturally may be more likely to require Assisted Conception Services. To be eligible for NHS funded fertility treatment same sex couples should be demonstrably sub-fertile. Same sex couples will be assessed if insemination on at least six non-stimulated cycles over a period of one year has failed to lead to a pregnancy, in the absence of known reproductive pathology. They should have access to professional consultation, independent advice and counselling in reproductive medicine to obtain advice and information on the options available to them. If a same sex couple has a diagnosed fertility problem on investigation then their sub fertility will be treated but NHS funding will not be available for either donor insemination (for same sex female couples) or for funding of surrogacy arrangements (for same sex male couples). This is on the basis that unless they are medically sub fertile their childlessness is due to the absence of gametes of the opposite sex and not due to both a medical cause and related healthcare need. The clinician should discuss with the couple the feasibility and preparedness of the other partner trying to conceive before proceeding to	
Age: Consider across age ranges, including on older and younger people. This can include safeguarding, consent and child welfare.	Neutral	There is no evidence requests for these procedures are linked to age; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of age. There is an upper age limit of 40 for women accessing Assisted Conception Services. This reflects NICE Guidance and is based on evidence of effectiveness. The hip impingement syndrome policy mentions that patients aged between 18 and 50 years are likely to gain most benefit. The multifocal intraocular lenses in treatment of adults with cataracts policy will consider requests to fund for children with rare cataract conditions on an individual patient basis.	
Religion or belief: Consider people with different religions, beliefs or no belief.	Neutral	There is no evidence requests for these procedures are linked to religion or belief; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of religion or belief.	
Marriage/civil partnership: Consider people who are married, not married, in a civil partnership, not in a civil partnership.	Neutral	There is no evidence requests for these procedures are linked to marriage/civil partnership; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of marriage/civil partnership. The Assisted Conception Service is equally accessible to married couples or people in a civil partnership. All couples should be in a stable relationship (at least two years), to fit with the definition of infertility.	

Gender reassignment (including transgender): Consider transgender people. This can include issues such as privacy of data and harassment.	Neutral	There is no evidence requests for these procedures are linked to gender reassignment; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of gender reassignment. This population group may require cryopreservation to preserve fertility services. This population group can access Assisted Conception Services if the criteria of the Commissioning Policy are met.	
Pregnancy and maternity: Consider working arrangements, part-time working, infant caring responsibilities.	Neutral	There is no evidence requests for these procedures are linked to pregnancy and maternity; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of pregnancy and maternity. People receiving Assisted Conception Services will not be within this protected group.	
Other identified group: Carers: Consider part-time working, shift-patterns, general caring responsibilities.	Neutral	There is no evidence requests for these procedures are linked to other identified groups; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of identified group.	
Other identified groups: Consider veterans, different socio-economic groups, people living in poverty, area inequality, income, resident status (migrants), people who are homeless, long-term unemployed, people who are geographically isolated, people who misuse drugs, those who are in stigmatised occupations, people with limited family or social networks, and other groups experiencing disadvantage and barriers to access.	Neutral	There is no evidence demand for these procedures is linked to any identified group; all adults who satisfy the patient eligibility criteria will be entitled to the procedure, regardless of identified group.	

8.1 Eliminate discrimination, harassment and victimisation: Where there is evidence, address each protected characteristic (age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation).	
All adults who satisfy the patient eligibility criteria will be entitled to the procedure regardless of any protected characteristic.	
8.2 Advance equality of opportunity: Where there is evidence, address each protected characteristic (age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation).	
All adults who satisfy the patient eligibility criteria will be entitled to the procedure regardless of any protected characteristic.	
8.3 Promote good relations between people with protected characteristics: Where there is evidence, address each protected characteristic (age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation).	
All adults who satisfy the patient eligibility criteria will be entitled to the procedure regardless of any protected characteristic.	
8.4 Addressing the impact on equalities: Supply an outline of what broad action you or any other bodies are taking to address any inequalities identified through the evidence.	
No inequalities identified.	

9. Financial Aspect			
Aspect	+ or - impact	Details	Plans to minimise negative impact
Implications for NHS Commissioning organisations	Positive	By limiting the service to those with a demonstrated clinical need, we reduce unnecessary procedures and therefore unnecessary cost.	
Implications for NHS provider organisations	Positive	By limiting the service to those with a demonstrated clinical need, we reduce unnecessary procedures and therefore unnecessary cost.	
Implications for health community	Positive	By limiting the service to those with a demonstrated clinical need, we reduce unnecessary procedures and therefore unnecessary cost.	
Implications for Peninsula	Positive	By limiting the service to those with a demonstrated clinical need, we reduce unnecessary procedures and therefore unnecessary cost.	
Implications for Local authorities	Neutral	No impact identified.	
Implications for voluntary sector	Neutral	Some patients may require support where they do not qualify for a procedure.	
Implications for private sector	Positive	If patients choose to privately fund an intervention that is not normally funded by NHS Kernow, they will retain their entitlement to other elements of NHS care. For example, if they privately fund a cancer drug or cancer intervention not normally funded by NHS Kernow they will retain their entitlement to all the other elements of cancer care that other residents of Cornwall and Isle of Scilly receive free of charge. However when patients are privately funding an intervention, they are responsible for all the costs associated with that intervention, including Consultant costs and diagnostics. They are therefore unable to receive a mixture of privately funded and NHS Kernow's funded care within the same appointment or intervention - they cannot 'top-up' NHS Kernow's funded appointment or intervention by paying for an additional intervention to be provided or monitored during the same consultation.	
Implications for individual/carer	Negative	If patients choose to privately fund an intervention that is not normally funded by NHS Kernow, they will retain their entitlement to other elements of NHS care. For example, if they privately fund a cancer drug or cancer intervention not normally funded by NHS Kernow they will retain their entitlement to all the other elements of cancer care that other residents of Cornwall and Isle of Scilly receive free of charge. However when patients are privately funding an intervention, they are responsible for all the costs associated with that intervention, including Consultant costs and diagnostics. They are therefore unable to receive a mixture of privately funded and NHS Kernow's funded care within the same appointment or intervention - they cannot 'top-up' NHS Kernow's funded appointment or intervention by paying for an additional intervention to be provided or monitored during the same consultation.	Patients still have the opportunity to apply through the Individual Funding Request route if they do not meet the eligibility criteria. However, if the policy is not routinely commissioned, requests for individual funding will not normally be considered, unless the circumstances fulfil the strict criteria for exceptionality as defined within the current policy for determining Individual Funding Requests (IFR).

10. Anticipated Climate of Opinion			
Aspect	+ or - impact	Details	Plans to minimise negative impact

Clinical opinion	Mixed	The policies are supported by clinicians, however there is a need for GPs to follow the policies and manage expectations for adults.	Good communication through the Referral Management Service and publication of policies and clinical sifting.
Local community	Neutral	No impact identified.	
Political	Negative	Constituents may appeal direct to MPs. Restrictions on NHS services and current NHS finances remain a highly politicised issue.	Clear communication on changes and reasoning behind them to manage expectations and mitigate negative experience. Engagement with MPs is recommended to ensure that they are aware of situation and justifications.
Media	Negative	Some patients who do not satisfy the patient eligibility criteria may engage in contacting the media.	Clear communication on changes and reasoning behind them to manage expectations and mitigate negative experience.
Staff	Negative	Some patients who do not satisfy the patient eligibility criteria may engage in complaints and queries, leading to an increase in communication to staff.	Already have a complaints procedure in place.

11. Any Other impact not Identified Above

Aspect	+ or - impact	Details	Plans to minimise negative impact
None identified.			

12. Impact on Core Human rights Values of: Fairness, Respect, Equality, Dignity, Autonomy - for Health Project consideration

Which of the Human Rights Articles does this document impact?	Yes	No	Plans to minimise negative impact
To life		✓	
Not to be tortured or treated in an inhuman or degrading way		✓	
To be free from slavery or forced labour		✓	
To liberty and security		✓	
To a fair trial		✓	
To no punishment without law		✓	
To respect for private and family life, home and correspondence		✓	
To freedom of thought, conscience and religion		✓	
To freedom of expression		✓	
To freedom of assembly and association		✓	
To marry and found a family		✓	
To an effective remedy		✓	
Not to be discriminated against in relation to the enjoyment of any of the rights contained in the European Convention		✓	
To peaceful enjoyment of possessions		✓	
To education		✓	
To free and fair elections		✓	