

## Equality & Health Impact Assessment for

### Religious Observation Guidelines

#### Part 1

Please answer all questions:-

1.	For service change, provide the title of the Project Outline Document or Business Case and Reference Number	N/A
2.	Name of Clinical Board / Corporate Directorate and title of lead member of staff, including contact details	Ffion Grundy, Equality, Diversity and Inclusion Manager.
3.	Objectives of strategy/ policy/ plan/ procedure/ service	<p>The objective of these guidelines is to outline the support available to employees in respect of undertaking prayer or meditative practice in the workplace and to advise managers on the protocol for managing requests for such.</p> <p> <a href="#">Annual Leave and Bank Holiday Policy</a>  <a href="#">Annual Leave Purchase Scheme</a>  <a href="#">Flexible Working Policy</a>  <a href="#">Special Leave Policy</a>  <a href="#">Work How It Works Best – Agile Working Policy</a>  <a href="#">Being Our Best</a>  <a href="#">Respect and Resolution Policy</a>  <a href="#">All Wales NHS Dress Code</a> </p>
4.	Evidence and background information considered. For example <ul style="list-style-type: none"> <li>• population data</li> </ul>	<b>Staff data</b> – all data has been taken from the ESR records as at 31 March 2025.

- staff and service users data, as applicable
- needs assessment
- engagement and involvement findings
- research
- good practice guidelines
- participant knowledge
- list of stakeholders and how stakeholders have engaged in the development stages
- comments from those involved in the designing and development stages

Population pyramids are available from Public Health Wales Observatory and the 'Shaping Our Future Wellbeing' Strategy provides an overview of health need.

23% of the workforce have either not disclosed or not specified their Religious Belief.

### Religious Belief

Religious Belief	%
Atheism	27%
Buddhism	0%
Christianity	35%
Hinduism	1%
I do not wish to disclose my religion/belief	14%
Islam	2%
Judaism	0%
Other	11%
Sikhism	0%
Unspecified	9%

### Population data

We have also considered the general population data for Wales, the most recent of which, in relation to religion was published in the 2021 Census.

<b>No religion</b>	1,446,398	46.5%
<b>Christian</b>	1,354,773	43.6%
<b>Muslim</b>	66, 947	2.2%
<b>Hindu</b>	12,242	0.4%
<b>Buddhist</b>	10,075	0.3%
<b>Sikh</b>	4,048	0.1%
<b>Jewish</b>	2,044	0.1%
<b>Other religions</b>	15,926	0.5%

		<p><b>Religion not stated / did not answer</b>      195,041      6.3%</p> <p><a href="#"><u>Religion, England and Wales - Office for National Statistics</u></a></p> <p><b>Disability</b> 8% of our staff have indicated that they have a disability, but this Information is not known for 11% of staff.</p> <p><b>Engagement</b> In preparing this policy, consultation has taken place through the Policy Development Group, Staff Side Committee and Staff Network Groups.</p> <p><b>Good Practice Guidelines</b> The following were reviewed when producing the guidelines.</p> <p><a href="http://www.acas.org.uk/media/pdf/f/l/religion_1.pdf">http://www.acas.org.uk/media/pdf/f/l/religion_1.pdf</a>  <a href="https://www.equalityhumanrights.com/en/advice-and-guidance/religion-or-belief-discrimination">https://www.equalityhumanrights.com/en/advice-and-guidance/religion-or-belief-discrimination</a>  <a href="https://www.equalityhumanrights.com/en/advice-and-guidance/religion-or-belief-discrimination">https://www.equalityhumanrights.com/en/advice-and-guidance/religion-or-belief-discrimination</a>  <a href="https://www.cipd.co.uk/knowledge/fundamentals/emp-law/religious-discrimination">https://www.cipd.co.uk/knowledge/fundamentals/emp-law/religious-discrimination</a>  <a href="https://www.cipd.co.uk/knowledge/fundamentals/emp-law/religious-discrimination">https://www.cipd.co.uk/knowledge/fundamentals/emp-law/religious-discrimination</a></p>
5.	<p>Who will be affected by the strategy/ policy/ plan/ procedure/ service</p> <p>Consider staff as well as the population that the project/change may affect to different degrees.</p>	<p>All employees of Public Health Wales (PHW), including those within hosted bodies, those with honorary contracts, agency staff, temporary and fixed term staff, secondees and students.</p>

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## Part 2- Equality and Welsh language

### 6. EQIA / How will the strategy, policy, plan, procedure and/or service impact on people?

Questions in this section relate to the impact on people on the basis of their 'protected characteristics'.

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
<b>6.1 Age</b> For most purposes, the main categories are: <ul style="list-style-type: none"> <li>• under 18;</li> <li>• between 18 and 65; and</li> <li>• over 65</li> </ul>	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	
<b>6.2 Persons with a disability as defined in the Equality Act 2010</b> Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-	There may be a negative impact on those with disabilities in relation to accessing the allocated prayer room on a particular site	Line Managers to review arrangements with the individual and adjustments to be made to ensure they can access the room or find a suitable alternative. It may not always be	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
term medical conditions such as diabetes		possible to make adjustments depending on the building.	
<p><b>6.3 People of different genders:</b>            Consider men, women, people undergoing gender reassignment</p> <p><b>NB</b> Gender-reassignment is anyone who proposes to, starts, is going through or who has completed a process to change his or her gender with or without going through any medical procedures. Sometimes referred to as Trans or Transgender</p>	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
<b>6.4 People who are married or who have a civil partner.</b>	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	
<b>6.5 Women who are expecting a baby, who are on a break from work after having a baby, or who are breastfeeding.</b>	Women who are breastfeeding may be negatively impacted as the room allocated for breastfeeding may also be the same room that is to be used for prayer and meditation.	Line managers to discuss arrangements with breastfeeding women and where necessary ensure they book a meeting room or space in the building where they can be guaranteed availability to breastfeed.	
<b>6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers</b>	No positive or negative impact	All staff must be treated fairly and consistently in the application of these guidelines.	

<p><b>How will the strategy, policy, plan, procedure and/or service impact on:-</b></p>	<p><b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b></p>	<p><b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b></p>	<p><b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b></p>
<p><b>6.7 People with a religion or belief or with no religion or belief.</b> The term 'religion' includes a religious or philosophical belief</p>	<p>We recognise diverse faiths and beliefs people have in PHW and want to support them to pray and meditate during the working day.</p> <p>Those who wish to take time to pray or meditate during work may be negatively impacted, as it is not always clear where the dedicated room is for this purpose and in some locations, there is no facility to allocate a specific room.</p> <p>Employees who choose to use the room provided for these purposes are requested to respect the rights of other individuals to observe their personal</p>	<p>Employees should be encouraged to discuss their needs with their line manager and facilities.</p>	<p><b>Multi-faith rooms:</b> rooms are available across all our buildings, including where staff may work in a Health Board building. Please work with your line manager, to find a suitable room. Please contact the Facilities Team, should you have any questions –</p> <p><a href="mailto:PHW.Facilities@wales.nhs.uk">PHW.Facilities@wales.nhs.uk</a></p> <p>Flexible working arrangements to allow for religious observances should be granted where possible, in line with the <a href="#">Flexible Working Policy</a>, and <a href="#">Work How It Works Best Agile Working Policy</a>.</p>

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
	<p>beliefs and this includes not using the room for eating or drinking.</p> <p>During Ramadan, individuals may be fasting and therefore may feel more tired during the working day.</p>		
<b>6.8 People who are attracted to other people of:</b> <ul style="list-style-type: none"> <li>• the opposite sex (heterosexual);</li> <li>• the same sex (lesbian or gay);</li> <li>• both sexes (bisexual)</li> </ul>	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	
<b>6.9 People according to their income related group:</b> Consider people on low income, economically inactive, unemployed/workless,	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
people who are unable to work due to ill-health			
<b>6.10 People according to where they live:</b> Consider people living in areas known to exhibit poor economic and/or health indicators, people unable to access services and facilities	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	
<b>6.11 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service</b>	No other groups identified that may be positively or negatively impacted.		
<b>6.12 Welsh Language</b>			
<b>There are 2 key considerations to be made during the development of a policy, project, programme, service to ensure there are no adverse effects and/or a positive or increased positive effect on:</b> (please note these will continue to be reviewed to ensure Public Health Wales fulfils their duties to comply with one or more standards outlined within the Welsh Language Standards (No 7) Regulations 2018)			

<b>How will the strategy, policy, plan, procedure and/or service impact on:-</b>	<b>Potential positive and/or negative impacts (unintended consequences) Opportunities or gaps</b>	<b>Action taken by Directorate.</b> Make reference to where the mitigation is included in the document, as appropriate <b>This column is to be updated in future reviews</b>	<b>Recommendations for improvement/ mitigation/ identified gaps or opportunities</b>
<b>Opportunities for persons to use the Welsh language</b>	No positive or negative impact	All staff are treated fairly and consistently in the application of these guidelines	
<b>Treating the Welsh language no less favourably than the English language</b>	No positive or negative impact		

### **Part 3 – Health**

Questions in this section relate to the impact on the health and wellbeing outcomes of the population **and** specific population groups who could be more impacted than others by a policy/project/proposal.

The part of the assessment identifies;

- which specific groups in the population could be impacted more (inequalities)
- what those potential impacts could be across the wider determinants of health framework?
- Potential gaps, opportunities to maximise positive H&WB outcomes
- Recommendations/mitigation to be considered by the decision makers

#### **7. Identification of specific population groups**

Use the WHIASU Population Groups checklist as a reference to identify the population groups who could be more impacted than others by a policy/project/proposal. The check list can be found on the PHW Integrated EqHIA guidance pages (requires link to PHW Intranet pages for additional information and resources)

The groups listed have been identified as more susceptible to poorer health and wellbeing outcomes (health inequalities) and therefore it is important to consider them in a HIA assessment. In a HIA, the groups identified, as more sensitive to potential impacts will depend on the characteristics of the local population, the context, and the nature of the proposal itself.

7.1 Groups identified	Rational/explanation
No positive or negative impact	

**Assessment**

Complete the wider determinants framework table below providing rational/evidence where appropriate:

1. Consider how the proposal could impact on the population and specific population groups identified above (positive/negative) for each of the wider determinants (the bullets under each determinant are there as a guide)
2. Record any unintended consequences (negative impacts) and/or gaps identified
3. Record any positive impacts or missed opportunities to maximise positive health and wellbeing outcomes
4. identify and record mitigation/recommendations where appropriate

**Please note** you may find that not all determinants are relevant to the project/plan however recording N/A is not acceptable a rational or evidence should be explained/referenced

Wider determinant for consideration	Positive impacts or additional opportunities.	Unintended consequences or gaps	Population groups affected	Mitigation/recommendations
<b>7.2 Lifestyles</b> <ul style="list-style-type: none"> <li>• Diet/nutrition/breastfeeding</li> <li>• Physical activity</li> </ul>	Women who are breastfeeding may be		All colleagues	Try to have dedicated rooms for breastfeeding and

<ul style="list-style-type: none"> <li>• Use of alcohol, cigarettes, e-cigarettes</li> <li>• Use of substances, non-prescribed drugs, abuse of prescription medication</li> <li>• Social media use</li> <li>• Sexual activity</li> <li>• Risk-taking activity i.e. gambling, addictive behaviour</li> </ul>	<p>negatively impacted as the room allocated for breastfeeding may also be the same room that is to be used for prayer and meditation.</p> <p>Employees who choose to use the room provided for prayer or meditation may be negatively impacted if others use the room for eating or drinking.</p>		<p>Breastfeeding colleagues</p> <p>Colleagues who pray or meditate</p>	<p>prayer/meditation where possible.</p>
<p><b>7.3 Social and community influences on health</b></p> <ul style="list-style-type: none"> <li>• Adverse childhood experiences</li> <li>• Citizen power and influence</li> <li>• Community cohesion, identity, local pride</li> <li>• Community resilience</li> <li>• Domestic violence</li> <li>• Family relationships</li> <li>• Language, cultural and spirituality</li> <li>• Neighbourliness</li> <li>• Social exclusion i.e. homelessness</li> <li>• Parenting and infant attachment</li> </ul>	<p>Positive impact for members of our communities who have a Religious Faith or Belief to feel respected, represented and have a sense of belonging.</p>		<p>Colleagues who pray or meditate</p>	<p>Encourage colleagues to attend REACH Network events and meeting to learn and understand more about staff experiences. Complete additional online learning through our L&amp;D Hub.</p> <p>Use reporting mechanisms to highlight and report any</p>

<ul style="list-style-type: none"> <li>• Peer pressure</li> <li>• Racism</li> <li>• Sense of belonging</li> <li>• Social isolation/loneliness</li> <li>• Social capital/support/networks</li> <li>• Third sector &amp; volunteering</li> </ul>	<p>Possible negative impact due to racism and negative language due to promoting prayer rooms and inclusive spaces and allowing staff to take time during the day to pray.</p> <p>We acknowledge that different faiths and cultural traditions observe mourning and bereavement in diverse ways.</p> <p>Negative impact is that some managers won't allow flexibility for specific rituals, extended periods of reflection, or designated times away from work to honour the</p>			<p>negative experiences and racism in PHW.</p>
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	<p>passing of a loved one.</p> <p>Positive impact is to respect these practices, reasonable flexibility will be provided to employees who require additional time to grieve or observe mourning in accordance with their religious or cultural beliefs.</p> <p>Positive impact on staff is that we have we have several staff network groups including our REACH (Race, Ethnicity and Cultural Heritage).</p>			
<p><b>7.4 Mental Wellbeing</b></p> <ul style="list-style-type: none"> <li>• Does this proposal support sense of control?</li> <li>• Does it enable participation in community and economic life?</li> </ul>	<p>Potential positive impact that PHW is acknowledging different religions</p>		<p>All colleagues</p>	<p>Encourage colleagues to attend REACH Network events and meeting to learn and understand more about</p>

<ul style="list-style-type: none"> <li>Does it impact on emotional wellbeing and resilience?</li> </ul>	<p>or beliefs which is representative of the communities in Wales and supporting our staff through our staff network groups including our REACH (Race, Ethnicity and Cultural Heritage).</p>		<p>Colleagues who pray or meditate</p>	<p>staff experiences. Complete additional online learning through our L&amp;D Hub.</p>
<p><b>7.5 Living/ environmental conditions affecting health</b></p> <ul style="list-style-type: none"> <li>Air quality</li> <li>Attractiveness/access/availability/quality of area, green and blue space, natural space.</li> <li>Health &amp; safety, community, individual, public/private space</li> <li>Housing, quality/tenure/indoor environment</li> <li>Light/noise/odours, pollution</li> <li>Quality &amp; safety of play areas (formal/informal)</li> <li>Road safety</li> <li>Urban/rural built &amp; natural environment</li> <li>Waste and recycling</li> <li>Water quality</li> </ul>	<p>Possible negative impact for Health and safety as any space provided for prayer should also comply with health and safety regulations, ensuring that it is safe and fit for purpose.</p>		<p>Colleagues who pray or meditate</p>	<p>Ensure all rooms comply with health and safety regulations.</p>
<p><b>7.6 Economic conditions affecting health</b></p> <ul style="list-style-type: none"> <li>Unemployment</li> <li>Income, poverty (incl. food and fuel)</li> <li>Economic inactivity</li> <li>Personal and household debt</li> </ul>	<p>Positive impact on our employees as we continue to create supportive and inclusive workplace</p>		<p>All colleagues</p>	

<ul style="list-style-type: none"> <li>Type of employment i.e. permanent/temp, full/part time</li> <li>Workplace conditions i.e. environment culture, H&amp;S</li> </ul>	cultures for all our employees.			
<p><b>7.7 Access and quality of services</b></p> <ul style="list-style-type: none"> <li>Careers advice</li> <li>Education and training</li> <li>Information technology, internet access, digital services</li> <li>Leisure services</li> <li>Medical and health services</li> <li>Other caring services i.e. social care; Third Sector, youth services, childcare</li> <li>Public amenities i.e. village halls, libraries, community hub</li> <li>Shops and commercial services</li> <li>Transport including parking, public transport, active travel</li> </ul>	Possible negative impact as some of our staff are unable to access regular intranet access to link in with staff network activities.		All colleagues	Allow time during the working day as part of breaks and flexible working, to encourage colleagues to attend network activity and complete online training courses.
<p><b>7.8 Macro-economic, environmental and sustainability factors</b></p> <ul style="list-style-type: none"> <li>Biodiversity</li> <li>Climate change/carbon reduction/flooding/heatwave</li> <li>Cost of living i.e. food, rent, transport and house prices</li> <li>Economic development including trade</li> <li>Government policies i.e. Sustainable Development principle (integration; collaboration; involvement; long term thinking; and prevention)</li> <li>Gross Domestic Product</li> <li>Regeneration</li> </ul>	No positive or negative impact			

### Stage 3

**Summary of key findings and actions Please answer question 8.1 following the completion of the EHIA and complete the action plan**

Key findings: Impacts/gaps/opportunities	Actions (what is needed and who needs to do) to address the identified mitigation and recommendations	Lead		
<p>The guidelines may impact those with a religion or belief, those with physical disabilities, breastfeeding women and staff not having the same experience – a quiet area in regional offices for PHW for prayer and/or meditation</p>	<p>The guideline aims to address any impact by ensuring that all staff are treated fairly and consistently with line managers and facilities providing support relevant to individual circumstances.</p>			

**Alternatively, if appropriate, please explain the steps taken to consult with and consider the differential impact of the changes on the various protected characteristic groups (part 2) or any specific identified population groups (part 3).**