

# **ORG032**

# **Freedom of Information Requests**

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Please be advised that Berkshire Healthcare discourages the retention of hard copies of policies and can only guarantee that the policy on Nexus is the most up-to-date version.

Designated Lead:	Company Secretary							
Policy author(s)	Assistant Company Secretary Deputy Executive Office Manager Freedom of Information Officer							
	Name	Division / Service	Date approved					
	Company Secretary	Corporate; Executive Office	12/05/2025					
	Assistant Company Secretary	Corporate; Executive Office	12/05/2025					
Individuals approved by	Deputy Executive Office Manager	Corporate; Executive Office	09/05/2025					
	FOI Officer	Corporate; Executive Office	09/05/2025					
	FOI Stakeholders (including Heads of Service and Service Managers)	Corporate; HR, CFAA; CAMHS	07/03/2025					
	Deputy Director	09/05/2025						
Relevant meetings, groups, committees approved by	Diversity Steering Gro	up 14 April 2025 ce Committee 24 May 202	<u> </u>					
Endorsing Group	Policy Scrutiny Group							
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Ratifying Group	Safety, Experience, Clinical Effectiveness Group (SECEG)							
Date Ratified	August 2025							
Review date	August 2028							
Version	11							



## **VERSION CONTROL**

Date	Indicate one Date		Version No.	Title of Audion	Date Ratified		(where	Line No's (where	Details of change	
	Minor	Full Review		Title of Author		,	amended)	amended)	Inserted	Deleted
May 2021	*		9						Amended to reflect changes in the Berkshire Healthcare organisational structure and minor amendments to current procedures.	
Mar 2023	*		10	FOI Officer	April 2023	SECEG			Amended to reflect HQ office change, minor amendments to current procedure and addition of Appendix 6.	
Apr 2025		*	11	FOI Officer	August 2025	SECEG	All pages	All lines	New cover sheet     New version control     New contents:         Introduction         Purpose of Policy         Definitions of Key Terms         Monitoring         Implementation and Training         Dissemination and Publication         Signposting reader to FOI Nexus page         Updated EqIA	Removing the ICO Flow Chart and instead hyperlinking Amending term 'application' to 'request' Amending term 'applicant' to 'requester' Appendix 2-6, instead signposting to FOI Nexus page

Summary of the changes made. All versions are held centrally- please contact Policy Scrutiny Group to access older versions. Please include whether this policy replaces any preexisting policies.

For policy information:

Policyandscrutinygroup@berkshire.nhs.uk

This policy has been assessed for compliance with <u>CQC Fundamental Standards</u>.



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#### 1. INTRODUCTION

Berkshire Healthcare NHS Foundation Trust (hereinafter referred to as Berkshire Healthcare) regards the Freedom of Information (FOI) Act 2000 as an important mechanism in achieving an honest and safe relationship with the Public in accordance with the Government's commitment to greater openness in the public sector.

The Freedom of Information Act 2000 (hereinafter referred to as the Act) gives a general right of access to recorded information held by public authorities, subject to certain conditions and exemptions.

Information on how to submit an FOI request can be found on our public website here: <u>Freedom of Information request</u> | Berkshire Healthcare NHS Foundation Trust

Any requests made for personal or group data (i.e. medical records, staff personnel files or emails) are not covered by the FOI Act. Please refer to the Data Subject Access Request Policy ORG030.

#### 2. PURPOSE OF POLICY

To give Berkshire Healthcare staff clear guidance on how FOI requests are handled and processes followed.

#### 3. SCOPE OF POLICY

This policy relates to all records (paper, electronic, on tape, etc.) held by Berkshire Healthcare and applies to all Berkshire Healthcare staff and to Non-Executive Directors who must adhere to this policy. Managers must ensure that employees, temporary staff, students, volunteers and other contractual staff are made aware of this document and their responsibilities.

There are two types of class exemption:

- **Absolute**, which do not require a test of prejudice or the balance of public interest to be in favour of non-disclosure.
- **Qualified** by the public interest test, which require the public body to decide whether it is in the balance of public interest to not disclose information.

Further information on exemptions can be found on the ICO's website here: <u>List of exemptions | ICO</u>.

Berkshire Healthcare aims to be transparent in its responses to information requests and will collaborate with relevant stakeholders to ensure accurate information is shared. However, there may be instances where it is appropriate to apply an exemption and withhold the requested information. Exemptions will be applied on a case-by-case basis at Berkshire Healthcare's discretion.

# 4. ASSOCIATED DOCUMENTS

Associated documents and information including FOI procedures and the FOI complaints process can be found at Freedom of Information (FOI) | Nexus

## 5. DEFINITIONS OF KEY TERMS

#### 5.1. Freedom of Information Act 2000

The Freedom of Information (FOI) Act 2000 is a UK law that grants the public the right to access information held by public authorities.

Its main purpose is to promote transparency and accountability in the public sector by allowing individuals to request recorded information from public sector organisations. The Act requires public authorities to publish certain information about their activities and enables the public to

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request additional information.

However, personal records such as medical records, are not eligible for release under the FOI Act and are only able to be released under Subject Access Requests (SAR). More information on how Berkshire Healthcare processes requests for medical records is available via the policy on Nexus here: ORG030 Data Subject Access Request

# 5.2 Information Commissioner's Office (ICO)

The Information Commissioner's Office (ICO) enforces and oversees the Data Protection Act 2018 and the Freedom of Information Act 2000. The Commissioner is a United Kingdom (UK) independent supervisory authority reporting directly to the UK Parliament and has an international role as well as a national one. In the UK the Commissioner has a range of duties including the promotion of good information handling and the encouragement of codes of practice for data controllers, that is, anyone who decides how and why personal data, (information about identifiable, living individuals) are processed.

#### 5.3. Publication Scheme

A scheme specifying the classes of information which it publishes or intends to publish, the manner of publication and whether the information is available to the public free of charge or on payment.

#### 6. ROLES AND RESPONSIBILITIES

To assist Berkshire Healthcare in fulfilling its statutory obligations all staff must be made aware of their responsibilities.

#### 6.1 The FOI Team

The Freedom of Information Officer, Assistant Company Secretary and the Deputy Executive Office Managers have the responsibility to ensure they complete training on the FOI Act, in order to ensure Berkshire Healthcare's compliance to the FOI Act.

#### 6.2 Chief Executive

The Chief Executive is accountable for the administration of this policy. They have overall responsibility for the implementation of this policy and for monitoring and reviewing it's effectiveness. They will:-

- Ensure that senior managers fulfil their responsibility in ensuring that this policy is adhered to
- Ensure that full commitment and support is provided and maintained in relation to the administration of this policy.
- Ensure a Berkshire Healthcare FOI Officer is appointed as a point of contact for all FOI matters. The FOI Officer can be contacted on foi.bht@berkshire.nhs.uk.

# 6.3 Executive Directors/Senior Leadership Team

Executive Directors and the Senior Leadership Team are managerially responsible for ensuring that this policy/procedure is implemented, communicated and monitored within their area of responsibility. They will:-

- Provide support to all staff that may be faced with difficulty in implementing this policy.
- Ensure Service Managers are aware of the FOI Officer.

## 6.4 Service Managers/Line Managers

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Service Managers are managerially accountable for all staff in their area of responsibility. They will:

- Ensure locally all staff are aware of this policy.
- Ensure locally that all staff are aware of whom to go to for day-to-day advice.
- Identify the systems or databases used to record information in their service area.
- Ensure that there is an effective mechanism for training of all relevant staff towards the implementation and monitoring of this policy.
- Ensuring the FOI Team receive the information needed to respond back to the requestor within the timeframe and/or redirect requests to the most appropriate person/team to respond
- Reviewing requests and seeking clarification where needed with the FOI team
- Ensuring the information provided is reviewed for accuracy and that any caveats are clearly stated.

## 6.5 Employees and Non-Executive Directors

All staff are obliged to adhere to this policy. A failure to adhere to this policy and its associated procedures may result in disciplinary action.

#### 7 POLICY CONTENT

# 7.1 Flow Chart Guide – Handling FOI Requests

#### Please see:

https://ico.org.uk/media2/migrated/1167/flowchart of request handling under foia.pdf

# 7.2 Guidelines on the procedure 7.1.1. Receiving Requests

Section 1 of the FOI Act has given a general right of access since 1<sup>st</sup> January 2005 to recorded information held by Berkshire Healthcare, subject to certain conditions and exemptions contained in the Act. Any requester making a request is entitled:

- to be informed in writing whether Berkshire Healthcare holds the information described in the request and
- if Berkshire Healthcare holds the information to have that information communicated to them.

This is known as the "duty to confirm or deny" and is fully retrospective in that if Berkshire Healthcare holds the information, it must, subject to certain terms and conditions, provide it.

Requests must be made in writing, e-mail or via the public website. Communications received by any member of staff in Berkshire Healthcare should be scanned and emailed immediately to <a href="mailto:foi.bht@berkshire.nhs.uk">foi.bht@berkshire.nhs.uk</a>. The request must include the full name of the requester and either a postal or email address for correspondence. It must fully describe the information requested. The email address for the Berkshire Healthcare FOI inbox can be accessed via the internet and intranet: <a href="mailto:foi.bht@berkshire.nhs.uk">foi.bht@berkshire.nhs.uk</a>.

See the FOI Nexus page for the process on responding to requests: <u>Freedom of Information</u> (FOI) | Nexus

## 7.2.2. Administering a Fee

Generally, Berkshire Healthcare will not charge a fee for information it has chosen to publish in its Publication Scheme. Charges may be levied for hard copies, multiple copies or copying onto media such as an external hard drive (e.g. USB memory stick).

The costings for the requester, will be in line with the guidelines issued by the Ministry of Justice and the Information Commissioner's Office (ICO). This is so that they can be informed in advance of providing the material, of how much in total their request may cost

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This will allow the requester to make the necessary payment for their request to be processed.

#### 7.2.3. Conditions and Exemptions

A list of conditions and exemptions are shown in Appendix 1.

## 7.2.4. Exempt Information

There are two classes of exemptions - Absolute and Qualified - detailed under Part II of the Act. Details of these are shown in Section 3. Scope of Policy

## 7.2.5. Timetable for Requests

Responses to requests shall be responded to within the 20-working day limit set by the Act, provided that all of the criteria set for the request, sufficient information, name, address, fee, etc. have been satisfied.

Where clarifications are required by Berkshire Healthcare, the clock will be stopped until the requester responds and the 20-working day limit is reset and restarted.

Requesters are offered 2 opportunities to clarify their request, if no further communication is received over a 3-week period, the FOI request will be closed. If the requester responds after this period, a new FOI request will be logged and worked on.

## 7.2.6. Arranging Information

When responding to a request for information, consideration must be given to any preferences expressed in the request for method of communication of the reply. Berkshire Healthcare will, so far as is reasonably practicable, give effect to that preference in accordance with Section 11 of the Act.

# 7.2.7. Aggregating the cost of a number of FOI requests

When estimating whether the appropriate time limit to work on a request is likely to be exceeded, Berkshire Healthcare can include the costs of complying with two or more requests, if the conditions laid out in regulation 5 of the Fees Regulations are satisfied. Those conditions require the requests to:

- be made by one person, or by different persons who appear to the public authority to be acting in concert or in pursuance of a campaign;
- relate, to any extent, to the same or similar information; and
- be received by the public authority within any period of 60 consecutive working days.

Requests cannot be aggregated when they clearly fall under different regimes, for example, the Freedom of Information Act, the Environmental Information Regulations or the Data Protection Act. For more details, please refer to <u>Calculating costs where a request spans</u> different access regimes.

'Two or more requests'

Two or more separate requests can be aggregated.

Multiple requests within a single item of correspondence are separate requests for the purpose of section 12 of the Act.

## 7.2.8. Refusal of Requests

Berkshire Healthcare may refuse a request for information for a number of valid reasons, some examples are:

• **Exemptions** - there are a number defined by the Act by which Berkshire Healthcare does not have to disclose to the requester.

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- **Data Protection Act (DPA)** the request is not part of FOI but a DPA Subject Access Request.
- Publications Scheme the request may be part of an existing publication that is already available.

Where a request for information has been refused, the requester must be informed of the refusal and reason why, in writing, within the time defined by the Act.

# 7.3. Requests for Documents due for Destruction

Documents can be legitimately destroyed as part of a planned programme within Berkshire Healthcare Records Management Policy. However, if a request for a document is received for a document due for destruction, the destruction must be suspended until such time as the request has been fully satisfied. It is criminal offence under the Act (Section 77) to knowingly destroy a document which you know has been requested.

## 7.4. FOI Complaints Procedure

If a requester is not satisfied with Berkshire Healthcare's response, they have a right to complain and request a review within 40 working days of their response. Public authorities are not obliged to accept requests for internal reviews after the 40 working day time-period.

A copy of the FOI Internal Review and Complaints Procedure can be found on the FOI Nexus page: Freedom of Information (FOI) | Nexus

The requester has the right to complain directly to the ICO under Section 50 of the FOI Act, should they be unhappy with the outcome of the internal review.

#### 7.5. Advice and Assistance

Section 16 of the Act means Berkshire Healthcare has a duty to provide advice and assistance to requesters and would-be requesters. Berkshire Healthcare will do this taking into account other statutory duties, e.g. the Equality Act 2010.

#### 7.6. Monitoring and Reviewing

The monitoring of the policy will take place by the FOI Officer and Assistant Company Secretary analysing the types of and numbers of questions asked by staff will assist in identifying the effectiveness of the policy. Any amendments to this document will be ratified by the Safety, Experience & Clinical Effectiveness Group and endorsed by the Policy Scrutiny Group. This policy will be reviewed on a 3 yearly basis. The FOI Officer and Assistant Company Secretary will review the effectiveness of this policy.

# **8 GLOSSARY OF TERMS AND ABBREVIATIONS**

Abbreviations and terms	Definition
FOI	Freedom of Information
ICO	Information Commissioners Office
DPA	Data Protection Act

# 9. REFERENCES

Freedom of Information Act 2000 c36. Available at: <a href="https://www.legislation.gov.uk/ukpga/2000/36/contents">https://www.legislation.gov.uk/ukpga/2000/36/contents</a> (accessed 4 June 2025)

Information Commissioners Office (nd) Request handling flowchart. Available at: <a href="https://ico.org.uk/media2/migrated/1167/flowchart">https://ico.org.uk/media2/migrated/1167/flowchart</a> of request handling under foia.pdf (accessed 4 June 2025)

Information Commissioners Office (2023) Calculating costs where a request spans different access regimes. Available at: <a href="https://ico.org.uk/for-organisations/foi/freedom-of-information-and-decess-regimes">https://ico.org.uk/for-organisations/foi/freedom-of-information-and-decess-regimes</a>.

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<u>environmental-information-regulations/calculating-costs-where-a-request-spans-different-access-regimes</u> (accessed 4 June 2025)

#### 10. MONITORING

Minimum requirement	Monitoring Process	Monitoring/ implementing Job title(s)	Frequency of the monitoring	Name of responsible group	Monitoring/ implementing group(s)
What is to be monitored	e.g., review of incidents/ audit/ performance Management	of individual(s) responsible for the monitoring and for developing action plan	(Minimum)	that is responsible for review of the results and of the action plan	committee reported to and responsible for monitoring implementation of the action plan
Compliance with requests being responded to within the 20-working days requirement, as set by the Act.	A live dashboard monitors open requests and compliance, flagging any that may go overdue.	The FOI Officer is responsible for monitoring the dashboard.	Live reporting	Executive Office	Executive Office and Information Governance Committee

## 11. IMPLEMENTATION AND TRAINING

Guidance and information on Freedom of Information is now included within the New Starter Area on Nexus eLearning. This means that all new starters will be given access to the New Starter Area and can review the content regarding Freedom of Information. The New Starter Area is also open to all staff, so colleagues are able to refer back to this portal once they are no longer new starters.

## 12. DISSEMINATION AND PUBLICATION

- 12.1 Following ratification, the Governance Administration Manager will publish the policy on Nexus.
- 12.2 Notification of the new and updated policy will be in the Team Brief newsletter.
- 12.3 Although ratified policies will be uploaded onto the intranet for immediate accessibility, it cannot be assumed that all staff will be aware of the new / revised version. Therefore, part of the dissemination plan needs to consider raising awareness and encouraging staff to read policy.

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## 13. EQUALITY IMPACT ASSESSMENT (EqIA)

An EqIA helps us to reach better evidenced outcomes first time. They analyse how all our work might impact differently on different people.

# 1. What is changing and why?i

The Freedom of Information Requests Policy (ORG32) has been reviewed and updated in line with its review date. Minor amendments have been made to condense the length of the policy from 22 pages down to 14 pages, as well as updating to the new policy template. Where applicable, we have hyperlinked the user to Nexus and the Information Commissioners Office (ICO) website for further information.

This policy is an important mechanism in achieving honest and safe relationships with the public sector. It outlines the process and gives guidance on releasing information held by Berkshire Healthcare, subject to certain conditions and exemptions.

# 2. What do you know? What disparities or inequalities already exist?<sup>ii</sup>

This policy applies to all staff (including Non-Executive Directors) and must be adhered to. Managers must ensure that employees, temporary staff, volunteers, students and other contractual staff are made aware of this document.

We have sought feedback from colleagues wider than the FOI team on this policy and have amended our response in line with the feedback provided. Along with sending this policy for review to the Diversity Steering Group, as well as the Information Governance Committee for scrutiny. Once approved, this policy will then go to the Policy Scrutiny Group for endorsement.

As a Community and Mental Health Trust, we understand that we receive a lower amount of FOI requests compared to our Acute partners. However, requests are increasing in volume year-on-year and we must ensure that our responses to requests for information are in line with the FOI Act. When responding to requests, we acknowledge that there is a possibility that our responses may be seen at large, especially when media organisations (e.g. journalists and news outlets etc.) are within the top three requester sources within 2024/25. With FOI requests, we are unable to ask a requester for personal information other than their name (e.g. gender, ethnicity, religious beliefs etc). However, we will always ensure that our response is neutral and shows no bias towards any individuals, or protected characteristics.

We acknowledge that as an NHS trust, we treat vulnerable people and it is important that although we respond to requests appropriately and in line with the FOI Act, we also do not put any patients, or staff, in a position where they could be identified and thus at risk. Although Berkshire Healthcare covers all of Berkshire (approx. 961,000 residents in the 2022 census), there may be a possibility that the recipient may know our patients or staff, and their safety is a priority to us. This means that there are occasions where we will use the appropriate exemption and will not disclose low figures when being asked for information regarding patients and staff.

We also acknowledge that publishing information that is requested under the FOI Act may expose discriminatory practices or actions that have taken place within the Trust, and that activists and researchers may use FOI requests to highlight any systemic discrimination within public sector organisations, and use this information to push for reforms that address intersectional inequalities.

The majority of our FOI requests are received digitally and therefore, responded to over email. However, on the occasion where we are asked to respond using an alternative method (e.g. via post, our response to be translated to another language or in an easy-read format), then we will accommodate this and action as appropriate.

# 3. Assessing the impact

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	Could benefit	impact	What does this mean? Impacts identified from what you know (actual, potential and unintentional)	What can you do? Actions (or why no action is possible) to advance equality of opportunity, eliminate discrimination, and foster good relations		
a) How could this affect different ethnicities? Including Gypsy, Roma, Traveller, Showmen and Boaters, migrants, refugees and asylum seekers.			We are unable to ask a requester for their ethnicity, unless they specify in their request.  Language barriers may affect access.	When we are asked for information regarding ethnicity (e.g. patient ethnicity or staff ethnicity), we do not releas information where the statistics are lower than 5 and the is a risk the individuals could be identified, in line with Section 40(2) of the Act.  Where required, we would accommodate any translation requests and action accordingly.  We also ensure that we are using the appropriate terminology in our responses, as advised by EDI colleagues (e.g. ethnically diverse rather than BAME) are that our responses to FOI requests are in line with the MarComms tone of voice guidelines.		
b) How could this affect cisgender and transgender men and women (including maternity/pregnancy impact), as well as non-binary people?			We are unable to ask a requester for their gender, unless they specify in their request.	Similarly to ethnicity, we would not release information where statistics are lower than 5 and there is a risk that individuals may become identifiable. However, if we are unable to provide certain statistics, we will try to find a way in which we can answer the request without putting any individuals at risk of being identified, or we will work with the requester to ask that they re-phrase their request so that we are able to answer. For example; we may be asked for a breakdown in patient referrals to a particular service, by age and gender. Rather than provide a combined breakdown which outlines patients age and gender (e.g. X number of females under 12, X number of males under 12), we would provide separate tables which outlines the totals (e.g. X number of male patients, X number of under 12s), as there is no way the requester can identify patients with the summary data.		
c) How could this affect disabled people or carers? <i>Including neurodiversity,</i>	×		We are unable to determine whether a requester is disabled, or a carer, unless they specify within	If we were to be made aware that reasonable adjustments were required as part of our response to a request, then we would accommodate (e.g. response is provided in an		

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invisible disabilities and mental health conditions.		their request.  Requesters with disabilities may need information in accessible formats.	easy-read format).  We work with services to ensure that we utilise the appropriate terminology within our responses (e.g. rather than using the term 'ASD', we now refer to this as Autism, as per guidance from our Neurodiversity Services).
d) How could this affect people from different faith groups?		We are unable to determine what faith a requester has, unless they specify within their request.	Responses to FOI requests are factual and straightforward, we would not include any opinions of bias towards any religion within our responses.
e) How could this affect people with different sexual orientations?		We are unable to determine a requester's sexual orientation, unless they specify within their request.	As a Trust we need to ensure that we provide a just culture that removes discrimination to patients and staff, regardless of their sexual orientation.
f) How could this affect different age groups or generations?		We are unable to determine a requester's age, unless they specify within their request.	We acknowledge that our online process of submitting an FOI request may not be accessible to individuals who do not have access to the internet, or knowledge on how to utilise our FOI process online. Therefore, we provide individuals with the option to submit their request in writing (handwritten or typed) and sent to our Head Office. The Act states that all FOI requests must be submitted in writing, however, if a requester is unable to do this, they can ask a member of staff their request and that they submit it on their behalf. All FOI requests must have a contact address (either postal or email), so that we can formally respond to the request.
g) How could this affect those who are married or in a civil partnership?		We are unable to determine a requester's relationship status, unless they specify within their request.	Responses to FOI requests are factual and straightforward, we would not include any opinions of bias towards any relationship status within our responses.
h) How could this affect people from different	×	We are unable to determine a requesters' social-economic	We acknowledge that there may be occasions where a requester does not have an address for us to respond to

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backgrounds such as: socio-economic disadvantage/deprivation, homeless, alcohol and/or substance misuse, people experiencing domestic and/or sexual violence, ex- armed forces, looked after children and care leavers?			background, ur within their requ	their request (either postal or email address). Therefore, in these instances, we could print off the respond and issue this to the individual in person. We would need a contact method for us to be able to make contact with the individual, to enable us to provide them with the formal response. All FOI responses are provided in writing.				
i) How could this affect people based on their geographic location or the area they live?	×		We are unable requester's loca specify within the	The FOI Act states that anyone in the world can request information under the FOI Act, therefore we are obliged to respond to a request, even if the requester is not local or based in the UK. This means there may be a language barrier, and translations are required to respond to a request. Where required, we would accommodate any translation requests and action accordingly.				
j) How could this affect people with multiple intersectional experiences? <sup>iii</sup>			We are unable whether a requintersectional ethey specify with	It is important that there is a wider action on ensuring that we provide a just culture that removes discrimination to patients and staff, especially those who have multiple intersectional experiences.				
4. Overall outcome	<u>'</u>		'					
No major change needed ☑ Adjust approach □ Adverse impact but continue □ Stop and remove □								
5. Details of further action	ns neede	d <sup>iv</sup> e.g. What	specific actions	would you take to a	ddress (hea	ılth) inequ	ualities?	
We work hard to ensure that our reassignment, pregnancy and m					cess for all ir	ndividuals,	regardless of age, disability, gender	
While we do not have a process use) based on feedback from co				ggestions and update	our processe	es where a	appropriate (e.g. new terminology to	
6. Arrangements for delivery and future monitoring <sup>v</sup> e.g. What output and process measures will be used?								
	We will continue to ensure that we meet the legislation set within the FOI Act, this will be formally reported to the Information Governance Committee and published on the public website ( <u>Freedom of Information request   Berkshire Healthcare NHS Foundation Trust</u> )							
7. Completed by:				Freedom of Informati / Executive Assistant	-	Date	01/05/2025	
8. Signed off by <sup>vi</sup> :						Date	Click or tap to enter a date.	

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<sup>&</sup>lt;sup>1</sup> Summarise the scope of the proposal including aims, context and timescales. Use <u>plain English</u>; refer to other document(s) if needed

Public Health England, Health equity assessment tool (HEAT) has further information about assessing impact for health inequalities <a href="Health Equity Assessment tool">Health Equity Assessment tool</a> (HEAT) - GOV.UK (www.gov.uk).

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<sup>&</sup>lt;sup>ii</sup> Summary of data about patients and/or colleagues (include consultation feedback where relevant, info from reviews, audits, national or wider data and local dashboards. What do you have in your team or dept?) Reference primary or secondary research/feedback, the date it was carried out and any gaps: including actions, timeframes and accountable persons for addressing gaps. Consider and note who you have engaged with and who else you need to engage with. E.g. patients, staff networks, trade unions, voluntary groups, forums etc.

Assess the cumulative impact. This looks at the combined influences of various impacts. E.g. young gay showmen.

<sup>&</sup>lt;sup>iv</sup> Outline further actions and/or recommendations. Will you review your approach, when will you do this? Can you align a review with any planned closure report, policy review or (event) evaluation?

<sup>&</sup>lt;sup>v</sup> Detail how you are delivering your project, policy change or service change. What governance arrangements are in place, which internal stakeholders have/will be consulted and informed about the project or changes? How do you intend to communicate any changes to the affected groups? e.g., easy read and communication plan

vi Sign off should be proportionate to the change and checked by someone outside of the area/dept/division. You may want to complete the template as a group if you are doing a project. If you are unsure, please speak to EDI Team EDITeam@berkshire.nhs.uk