

NHS South Sefton CCG
EQUALITY & DIVERSITY ANNUAL
REPORT
2017 2018

Contents

1.0 Foreword & Introduction, page 3.

- 1.1 Due regard and equality analysis reports
- 2.0 Equality Delivery Systems 2 (EDS2), page 4.
 - 2.1 Local Approach to EDS 2
 - 2.2 How did we do?
- 3.0 Equality Objective Plan 2016/19, page 6.
- 4.0 Monitoring Equality Performance with key NHS providers, page 6
- 5.0 Equality and the Workforce, page 7
 - 5.1 EDS 2 and the workforce
- 6.0 Governance, page 8.
- 7.0 Conclusion, page 8
- 8.0 Appendices, page 9 to page 31
 - Appendix 1 - CCG EDS 2 grades, page 9
 - Appendix 2 -Equality objective Plan 2012/2020, page 12 to 26
 - Appendix 3 - EDS 2 Provider performance, page 27 to 28
 - Appendix 4 - E&D Workforce Plan, page 29 to 31

Foreword

There is clear evidence that people's health, their access to health services and experiences of health services are affected by their age, gender, race, sex, sexual orientation, religion/belief, transgender, marital/civil partnership status and pregnancy/maternity status.

NHS South Sefton Clinical Commissioning Group strives to commission services that meet the needs of our communities in relation to access and outcomes for patients and we understand that this is more important than ever given the unprecedented financial pressures that the NHS currently faces and the challenges outlined in the 5 year forward view.

Graham Bayliss , South Sefton CCG's Lay Member for Patient and Public

1.0 Introduction

This document is the CCG's annual Equality & Diversity Report which sets out how the CCG is working with the Equality Act 2010 and in particular paying 'due regard' to the Public Sector Equality Duty's (PSED) three objectives to:-

1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Protected characteristics include; age disability, gender reassignment status, religion or belief, sex, sexual orientation, marriage and civil partnership status

This document outlines the CCG's approach to embedding Equality & Diversity within the organisations via the EDS 2 toolkit, setting Equality Objectives, monitoring the equality performance of our key NHS providers, ensuring our workforce are supported and engaged and that we have robust processes in place to consider our Public Sector Equality Duty (PSED) when we are making commissioning decisions. The report also outlines our strategy and plans to ensure we have strong engagement with people who share protected characteristics.

1. 'Due regard' and equality analysis reports

"Due regard" is a legal requirement and means that the Governing Body of the CCG has to give *advanced* consideration (consider the equality implications of a proposal before a decision has been made) to issues of 'equality and discrimination' before making any commissioning decision or policy that may affect or impact on people who share protected characteristics. It is vitally important to consider equality implications as an integral part of the work and activities that the CCG does.

'Due regard' can be paid by the Governing Body, officers can only support this process by developing information and presenting views to the Governing Body. The reports that go to the Governing Body are Equality Analysis reports – commonly known as Equality Impact Assessments (EIAs)

The reports will test the proposal and say whether it meets PSED and ultimately complies with the Equality Act 2010. The CCG is under a statutory duty to comply with The Equality Act 2010. Recommendations will be part of the reporting process, the Governing Body in making decisions have to consciously take into consideration the content of the reports as part of their deliberations and decision making process. Failure to do this would be grounds for Judicial Review.

Equality Analysis reports cannot be done after a decision is made as this is unlawful and could be grounds for Judicial Review.

South Sefton CCG is becoming stronger at developing and delivering Equality Analysis reports and linking them to the current change programme.

Equality Analysis reports have to consider the effect or impact of any change to policy, practice or procedure against all the protected characteristics this means that there has to be a strong link to the consultation and engagement process in order to identify different peoples perspectives and concerns.

Training and support has been given to all staff making them aware of the process and there are strong support mechanisms in place to help staff and the organisation to develop and deliver timely and accurate reports

2.0 Equality Delivery Systems (EDS2)

We have adopted the Equality Delivery System (EDS2) as our performance toolkit to support us in demonstrating our compliance with the Public Sector Equality Duty. The Equality Delivery System (EDS2) is a tool-kit that can support the CCG to improve access to the services we provide for our local communities, consider health inequalities in our borough and provide better working environments, free of discrimination, for those who work with us in the NHS.

The EDS 2 has four key goals (with 18 specific outcomes); **achieving better outcomes, improving patient access and experience, developing a representative and supported workforce and finally, demonstration of inclusive leadership**. Each of these goals can be assessed and a grading applied to illustrate progress in achieving the outcomes and the involvement of the communities and organisations which represent the views of people with protected characteristics. The grading's available are as follows:

Undeveloped if there is no evidence one way or another for any protected group of how people fare or Undeveloped if evidence shows that the majority of people in only two or less protected groups fare well

Developing if evidence shows that the majority of people in three to five protected groups fare well

Achieving if evidence shows that the majority of people in six to eight protected groups fare well

Excelling if evidence shows that the majority of people in all nine protected groups fare well

2.1 The local approach to EDS 2

During 2015/16, the CCG's adopted an innovative approach to delivering the EDS 2 Toolkit; engaging with national, regional and local organisations who represent the views of people and communities who share protected characteristics. The CCG undertook one-to-one meetings, workshops, interviews, briefings and research with partner organisations and stakeholders including to name but a few: Healthwatch, The Race Equality Foundation, Deaf Health Champions (Sick of It Report), In Trust Merseyside, Age Concern, Black Minority Ethnic Community Development project (hosted in Sefton CVS). The aim of the engagement was to ensure the CCG understood the 'barriers' communities across protected characteristics face to enable the CCG to improve access and outcomes. As a direct result of our EDS 2 exercise we have significantly revised our Equality Objective Plan (Appendix 2)

The CCG recognises that patients and staff who share certain protected characteristics are less likely to complain, complete NHS surveys or access community networks to provide their feedback and this level of engagement with stakeholders will ensure that the entrenched barriers communities face in relation to accessing healthcare services are understood and mitigated as part of the CCG's strategic and operational programmes. Meeting and understanding the needs of people is essential to remove disadvantage and advance equality of opportunity, so we will continue to endeavour to address these issues through mainstream plans, changing service specifications, the way we monitor our NHS providers, business plans and strategies, procurement activity, contract monitoring and discussions with key partners including NHS England, the Local Authority and community, voluntary and faith sectors.

The EDS2 findings identified a range of actions for CCG's Equality Objective Plan and EDS 2 grading. This process also informed the preparation of the CCG's *EDS2 Summary Submission* to NHS England for 2016/2017, which explains some of our processes.

The CCG's performance and grades have progressed from 'developing' status across all outcomes to 'achieving' status for seven outcome areas and this demonstrates the CCG is improving its equality performance. Once these key issues are being addressed and or mitigated via mainstream business plans then the CCG can maintain its status across the relevant outcomes and goals, during these challenging financial times.

The EDS2 assessment for the CCG can be viewed in **Appendix 1** below and each goal is presented alongside the national EDS 2 grading achieved by the CCG.

The CCG will be working closely on implementing EDS 2 over 2017/18 with other Merseyside CCGs and key providers including Southport & Ormskirk NHS Trust, , Alder Hey, Aintree Hospital, Liverpool Heart and Chest and Walton Neurological Centre. This new and innovative approach will ensure that all organisations are addressing the needs of the population as a whole in line with Accountable Care systems and the Five Year Forward View.

3.0 NHS South Sefton CCG Equality Objective Plan 2017/2020 (Appendix Two)

As a direct result of EDS 2 South Sefton CCG has developed a specific long term Equality Objectives Action Plan, which will enable the CCG to address barriers through mainstream plans including - changes to specifications, business plans and strategies, improving procurement activity and processes, changing quality contract monitoring and enabling improved information and intelligence exchange with key partners including NHS England, the Local Authority and Community, Voluntary and Faith Sector.

Some of the key issues are

- All commissioning organisations need improved processes to enable transparent decision making during unprecedented financial times, to ensure needs are considered and barriers and unequal outcomes are mitigated.
- Translation and interpretation across health services remains varied and standards need to be raised via work through the Quality Contract Schedule for Secondary Care Providers and establishing a base line of standards and usage in Primary Care
- The duty to carry out reasonable adjustments (Equality Act 2010) to support better access and outcomes for disabled people and frail elderly is often misunderstood, and needs to be addressed via contract monitoring and collaborative work between providers
- Understanding Transgender issues across health services is a key priority and needs to be progressed further within the CCG, the services they commission and Primary Care.

The CCG's current equality objectives are:-

- To make fair and transparent commissioning decisions;
- To improve access and outcomes for patients and communities who experience disadvantage
- To improve the equality performance of our providers through robust procurement and monitoring practice
- To empower and engage our workforce

The Objective Plan has mapped the Objectives, EDS 2 outcomes and Public Sector Equality Duties to each action area.

4.0 Monitoring the Equality & Diversity performance of our key NHS providers

During the year South Sefton CCG collaborated with neighbouring CCGs to ensure that contracts with key local NHS providers include requirements to achieve and improve equality and diversity standards, including through the Equality Delivery System.

Providers over 2016 were expected to:

- Show evidence that they have implemented the Accessible Information Standard
- Show and demonstrate progress against their Smart Equality Objectives Plan;
- Complete an EDS assessment
- Provide evidence of compliance with Equality Act 2010 specific duties (including the Workforce Race Equality Standard)
- Only take decisions about service redesign after an equality analysis or equality impact assessment has been carried out to demonstrate due regard of the PSED

- Provide data on the use of translation and interpretation services.
- Improve and develop awareness of how to provide reasonable adjustments

5.0 Equality & Diversity and the Workforce

The CCG is committed to developing a representative and supported workforce and we specifically consider equality and diversity for our staff. We aim to ensure that we have fair and equitable employment and recruitment practices as well as holding up to date information about the CCG's workforce. The CCG have developed a Workforce Equality and diversity plan in **Appendix 4** below and this will ensure we are cognisant of Equality Duties and our Workforce Race Equality Standard and that our relevant committees scrutinise the data available to them and ensure we value diversity and advance equality of opportunity for our staff. The CCG will work closely with the Human Resource Business Partners from Midlands and Lancashire Commissioning Support Unit to ensure compliance with the Equality Act 2010.

5.1 Workforce and EDS 2

A key part of our EDS 2 (Goal 3) assessment focusses on our workforce and for the majority of our outcomes we are graded as developing to achieving status. These grades can be viewed in **Appendix 1**. By rolling out our Equality Workforce Plan over the next two year we intend to progress to **achieving** across all our EDS 2 workforce outcomes.

5.2 Staff Training

Staff working within the CCGs undertakes annual equality and diversity training. The training is designed not only as an introduction to diversity and cultural awareness, but also as a practical guide to making our organisational culture an inclusive one. It combines a focus on personal and organisational beliefs, values and behaviours and the impact they have in our interactions at workplace, internally and externally. Furthermore all our staff within the CCG including commissioning programme leads, contract and procurement staff, finance, governing body members within the CCG have received specific training and or support on Equality Acts 2010, Public Sector Equality Duty compliance, specifically during these unprecedented financial challenging times.

6.0 Governance and accountability

The Chief Delivery and Integration Officer will be directly responsible to the Senior Management Team and Governing Body of the CCG for providing the necessary information on progress and compliance to the PSED as part of their update on equality and diversity, which is planned into the Governing Body reporting and meeting cycle. The CCG receives regular updates on E&D performance and risks via a number of groups including the Corporate Governance Group and EPEG and finance and resource Committee.

7.0 Conclusion

The CCG will continue to strive to ensure that the services the CCG commission are accessible to all. During the last twelve months we have made good progress around equality & diversity, developing new and building on existing relationships with groups and individuals who share and represent the interests of protected characteristics. This year's EDS2 exercise has allowed us to fully improve our understanding of what barriers certain communities face and tackle them through mainstream processes and plans. We have developed a refreshed and long term Equality Objective Plan 2016-2019 that focuses' on the internal processes we need to improve and the actions we need to undertake to tackle barriers and disadvantages certain communities face. The CCG has developed a Workforce Equality & Diversity Plan which aims to build on the solid foundations that are already in place. The CCG will continue to engage with the population and staff as a whole and continue to develop strong links with members of the population and groups who represent the interests of people who share protected characteristics and ensure that their views are built into the services we commission or the policies we develop.

NHS South Sefton CCG is committed to reducing health inequalities, promoting equality and valuing diversity as an important part of everything we do. This document clearly describes the headline activity that has taken place and more importantly it sets out the work and approaches that need to be undertaken to advance equality of opportunity.

The CCG will continue to monitor our progress against the action plan and report annually and openly on the development of this work and the CCG will ensure that it considers and pays due regard to its exacting Public Sector Equality Duty to support its difficult decision making during these unprecedented financial times in the NHS.

APPENDIX 1 SOUTH SEFTON CCG EDS 2 GRADES AND OUTCOMES

NHS South Sefton CCG EDS2: The Goals and Outcomes			Current Grade Status 2017	Grade status 2014-2016
Goal	Number	Description of outcome		
Better health outcomes	1.1	Services are commissioned, procured, designed and delivered to meet the health needs of local communities	Achieving	Developing
	1.2	Individual people's health needs are assessed and met in appropriate and effective ways	Achieving	Developing
	1.3	Transitions from one service to another, for people on care pathways, are made smoothly with everyone well-informed	Developing	Developing
	1.4	When people use NHS services their safety is prioritised, and they are free from mistakes, mistreatment and abuse	Developing	Developing
	1.5	Local health information and communications reach communities	Achieving	Developing

Improved patient access and experience	2.1	People, carers and communities can readily access hospital, community health or primary care services and should not be denied access on unreasonable grounds	Developing	Developing
	2.2	People are informed and supported to be as involved as they wish to be in decisions about their care	Developing	Developing
	2.3	People report positive experiences of the NHS	Developing	Developing
	2.4	People's complaints about services are handled respectfully and efficiently	Developing	Developing
A representative and supported workforce	3.1	Fair NHS recruitment and selection processes lead to a more representative workforce at all levels	Achieving	Developing
	3.2	The NHS is committed to equal pay for work of equal value and expects employers to use equal pay audits to help fulfil their legal obligations	Achieving	Developing
	3.3	Training and development opportunities are taken up and positively evaluated by all staff	Developing	Developing
	3.4	When at work, staff are free from abuse, harassment, bullying and violence from any source	Developing	Developing
	3.5	Flexible working options are available to all staff consistent with the needs of the service and the way people lead their lives	Developing	Developing
	3.6	Staff report positive experiences of their membership of the workforce	Developing	Developing
Inclusive leadership	4.1	Boards and senior leaders routinely demonstrate their commitment to promoting equality within and beyond their organisations	Achieving	Developing
	4.2	Papers that come before the Board and other major Committees identify equality-related impacts including risks, and say how these risks are to be managed	Achieving	Developing
	4.3	Middle managers and other line managers support their staff to work in culturally competent ways within a work environment free from discrimination	Developing	Developing

APPENDIX 2 NHS South Sefton CCG Equality Objective Plan 2017-2020

The CCGs current equality objectives are:-

1. To make fair and transparent commissioning decisions;
2. To improve access and outcomes for patients and communities who experience disadvantage
3. To improve the equality performance of our providers through robust procurement and monitoring practice
4. To empower and engage our workforce

Protected Characteristic	Key Issue and Barrier Identified	Action and Activity	Responsible Officer	Date	EDS Outcome PSED CCG Equality Objective
Race	Language and cultural barriers	Consider implementation of the new NHS England Translation and Interpretation (T&I) Framework for primary care when it is launched in 2016/17	Chief Delivery and Integration Officer	Awaiting launch In progress	1.1, 1.2,1.3, 1.4, 1.5, 2.1, 2.2, 2.3, 2.4
		Develop a local T&I Policy and awareness raising programme for the CCG and Primary Care (and cross-reference with the NHS England guidance when received).	Senior Governance manager & Chief Delivery and Integration Officer & Head of communications and engagement	March 2018 In progress	Eliminate Discrimination Advance Equality Of Opportunity Equality Objectives 1,2,3

		Identify relevant data that can support the CCG to measure T&I usage in Primary Care	Senior Governance manager & Primary care lead	July 2017 completed	
		Ensure key secondary care providers continue to report on T&I usage as set out in the Quality Contract Schedule 2016/17	Chief Nurse	Completed – on going	
		CCG to consider developing a Bilingual Volunteer project to provide non- clinical T&I support to the CCG and partners	Senior Governance manager & Chief Delivery and Integration Officer	March 2018 In progress	
Race	Lack of understanding of which services to access and inappropriate	Work collaboratively with relevant community groups and health services to develop local communications to support appropriate access - including registration with GPs	Senior Governance manager & VCF representatives	March 2018 (In progress)	2.1, 1.1 Advance Equality of Opportunity

	A&E attendance	Ensure Specification for CCG funded Community Development (CD) BME related project reflects actions within the Equality Objective Plan and EDS2 exercise Intelligence barriers feeds into CCG	Chief Delivery and Integration Officer	March 2018 Completed	Equality Objectives 1,2
Race	Lack of Cultural understanding within commissioning and primary and secondary care services	Promote CD BME organisation's offer and promote cultural competency training across CCGs, primary and secondary care	Senior Governance manager	December 2017 Completed	1.1, 1.5, 2.1 Advance Equality Of Opportunity Foster Good Community Relations Equality Objectives 1, 2,3
Disability / age / frail elderly	Lack of understanding of reasonable adjustments by health	Accessible information Standard is embedded across the CCG and promoted across GP Practices	Senior Governance manager & Chief Delivery and Integration	March 2018 In progress	1.1,1.2,1.3,2.1 Advance Equality of Opportunity

	professionals across health services		Officer		Equality Objectives 1,2,3
	Implement Accessible Information Standard	Develop a local T&I policy and awareness raising programme for the CCG and Primary Care. (Future NHS England guidance will be cross referenced into the local policy and programme)	Senior Governance manager & Head of communications and engagement	March 2018 In progress	
	Duty to make Reasonable Adjustments	Develop comprehensive reasonable adjustment guidance to support improvements in standards in Primary, Community and Secondary Care and share with the Local Authority to consider for their services	Senior Governance manager & Chief Delivery and Integration Officer	December 2017 Completed	
		Ensure Accessible Information Standard and the need to make reasonable adjustments is monitored with the providers via the Quality Contract Schedule	CCG E&D Lead and Chief Nurse	Completed	

		Develop and distribute Reasonable Adjustment Guidance Develop communication brief on the Standard to be issued to primary care (GPs)	Senior Governance manager & primary care lead	Completed	
		Produce brief 'Consider Reasonable Adjustments' CQUIN proposal' and address in Quality schedule	Senior Governance manager	Completed	
Age - young people and working age older citizens	Further explore potential for vulnerable Young People to face disadvantages	Issue will be addressed in the Merseyside Quality Surveillance thematic work stream for mental health and Crisis Care (co-ordinated by Halton CCG's Head of Quality and Chief Nurse)	Senior governance Manager & Chief Nurse	December 2018 In progress	1.1, 1.2, 1.4, 1.3 Advance Equality of Opportunity Equality Objectives 2,3

		Voice of the Child activity – feeds into commissioning activity	Chief nurse	March 2018 Completed	
Age - older citizens	Waiting times and timescales of referrals and appointments for frail elderly and older citizens living alone	Address concerns raised by age organisations in the community specifically on inappropriate appointment times in Primary and Secondary Care (in conjunction with Halton CCG's Head of Quality and Chief Nurse)	Senior Governance manager & Chief Delivery and Integration Officer	December 2016	1.1,1.2,1.3, 1.4, 2.1, 2.3, Advance Equality of Opportunity
		Implement Accessible Information Standard into provider contracts and monitor	Senior Governance Manager Primary care	Completed	Equality Objectives 2,3

			lead		
		Ensure Serious Incidents Policy and activity consider PSED and needs associated with protected characteristics via the Quality Surveillance Group in conjunction with Halton CCG's Head of Quality and Chief Nurse	Senior Governance manger & Chief nurse	March 2017 Completed	
Transgender	Lack of understanding of trans issues and variation in service standards	Explore options to improve knowledge and understanding of the Transgender community across health services (issues raised are stored in EDS Engagement Excel spreadsheet) Continue to develop local responses to Trans needs across Primary Care and links with In Trust Merseyside	Senior Governance Manager & Chief Nurse Transgender lead	March 2018 On- going	1.1, 1.2, 1.3, 1.4, 2.1, 2.2, 2.3 Eliminate discrimination, Advance Equality of Opportunity Equality Objectives 1,2,3,4

Sexual Orientation & Transgender	Poorer patient experience and lack of understanding of needs across health services	Develop a proposal to support and improve awareness raising of LGBT issues across the CCG, primary care and secondary care to improve access and outcomes Please note barriers are listed in the EDS2 engagement document	Senior Governance Manager & Head of Communication & Engagement	March 2019 In Progress	1.1, 1.2, 1.4 Eliminate Discrimination Advance Equality of Opportunity Foster Good Community relations Equality Objectives 1,2,3,4
Pregnancy & Maternity	Barriers will be identified via the maternity services review pre and post Equality Assessment process	Barriers will identified via the maternity services review pre and post Equality Assessment process –in line with Improving Me timescales	Co-ordinating CCG lead	March 2018 In Progress	1.1,2.1,1.21.3 Eliminate Discrimination Advance Equality of Opportunity Foster Good Community Relations Equality Objectives

					1,2,3,4
All Protected Groups	Human resources and workforce	Develop an Equality Workforce Plan in conjunction with CSU HR Business Partners to be ratified and approved at CCG HR Committee	CSU Business Partner	Completed	3.1,3.2,3.3,3.4,3.5,3.6 Eliminate Discrimination Advance Equality of Opportunity Foster Good Community relations Equality Objective 4
		Embed and implement the Workforce Race Equality Standard	Governance manager & Chief Delivery and Integration Officer CSU HR Business Partner	April 2016 and repeated in line with NHSE guidance Completed	Equality Objective 4 Advance equality of Opportunity

All Protected Groups		Ensure EDS2 approach and plans are embedded into the refreshed Communications and Engagement Plans & activity	Communication and Engagement Manager & Chief Delivery and Integration Officer	November 2017 Completed	Equality Objectives 1,2,3,4 All PSED 1.1,1.2,2.1,4.2
		Ensure that Governing Body, and other key decision- making panels (including Individual Funding Requests) and programme leads receive the appropriate level of E&D training	Senior Governance Manager & Governance manager & Chief Delivery and Integration Officer	March 2018 In Progress	

	Develop guidance to support the CCG to pay due regard to PSED for difficult commissioning decisions, including reductions in service and cessations	Senior Governance Manager & Governance manager & Chief Delivery and Integration Officer Chief Operating Officer	June 2016 Completed	
	Continue to monitor and improve the equality performance of providers	Senior Governance Manager & Chief Nurse	On-going	

	Continue to work closely with NHS provider's Equality Leads through the NHS Equality Leads Provider Forum to improve access and outcomes for protected groups	Senior Governance Manager	March 2018 On – going	
	Ensure governance and decision-making committee templates are reviewed to meet Equality Act 2010 requirements	Senior Governance Manager &	March 2018 In progress	
	Develop guidance and support embedding the Equality Act requirements and Fair Consultation principles into consultation and engagement activity	Senior Governance Manager & Head of Communication & Engagement	March 2018 In Progress	

		Embed comprehensive Equality Analysis into the CCG's key Projects and redesign Programme Management Process and Quipp	Senior Governance Manager & Chief Operating Officer	March 2017 Completed	
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In the last column each Objective plan action has been mapped to the CCG's Equality Objectives (above), EDS 2 18 outcomes and Public Sector Equality Duties

APPENDIX 3 Key NHS Provider EDS 2 grades

Goal	Number	Merseycare	Liverpool Women's	Aintree	Alder Hey	Wirral and Cheshire Partnership (Access Sefton IAPT)	Liverpool Heart & Chest	Southport and Ormskirk
Better health outcomes	1.1	Achieving	Achieving	Developing	Developing	Developing	Developing	Developing
	1.2	Achieving	Achieving	Developing	Developing	Developing	Developing	Developing
	1.3	Achieving	Developing	Developing	Excelling	Developing	Developing	Developing
	1.4	Achieving	Achieving	Developing	Achieving	Developing	Developing	Developing
	1.5	Developing	Achieving	Developing	Developing	Developing	Developing	Developing
Improved patient access and experience	2.1	Achieving	Achieving	Developing	Developing	Developing	Developing	Developing
	2.2	Achieving	Achieving	Developing	Achieving	Developing	Developing	Developing
	2.3	Achieving	Achieving	Developing	Developing	Developing	Achieving	Developing
	2.4	Achieving	Achieving	Developing	Developing	Developing	Achieving	Developing
A representative and supported workforce	3.1	Achieving	Achieving	Developing	Developing	Achieving	Developing	Developing
	3.2	Achieving	Achieving	Developing	Under Developed	Achieving	Achieving	Developing
	3.3	Achieving	Developing	Developing	Under Developed	Achieving	Developing	Developing

	3.4	Achieving	Developing	Developing	Developing	Achieving	Developing	Developing
	3.5	Achieving	Achieving	Developing	Developing	Achieving	Developing	Developing
	3.6	Achieving	Achieving	Developing	Developing	Achieving	Developing	Developing
Inclusive leadership	4.1	Achieving	Developing	Developing	Developing	Achieving	Developing	Developing
	4.2	Achieving	Developing	Developing	Developing	Achieving	Developing	Developing
	4.3	Developing	Developing	Developing	Developing	Achieving	Developing	Developing

APPENDIX 4 Workforce E&D plan and progress report

Task	Activity	Outcome	EDS comparator	Action plan
Policy Proofing 2016-2018	Prioritise policies Identify policy against essential list Identify guidance with policy ¹ and test for indirect discrimination & advancing opportunity	<ol style="list-style-type: none"> 1. Proportional input. 2. Cover fundamental elements of Equality Act 2010 3. Impact assess process against PSED – identifying any remedial actions 	3.4	All CCG HR Policies which have been ratified have now been equality impact assessed. All Policies have been prioritised in relation to Public Sector Equality Duty (PSED). Owner – Human Resource Business Partner (HRBP) Completed
Monitoring 2016-2018	Identify policies and performance for monitoring – check against key tasks: <ul style="list-style-type: none"> • Recruitment • Selection • Review & performance • Disciplinary 	Establish monitoring system Identify indirect discrimination Consider positive action or corrective action	3.1 3.2 3.3 3.4 4.3	These policies have been ratified and have been equality impact assessed. HRBP is currently working with the Workforce Team to establish relevant monitoring systems for each of these key policies. CSU HR team to be EIA trained on October 2017. Development of Task and Finish Groups to ensure robust processes

¹ policy may be a statement of intention but the process of enacting the policy, i.e. guidance notes, also needs to be proofed

				Owner – HRBP In Progress
Training March 2018	Identify current training programmes linked to E&D	Proof suitability and identify gaps in provision. Check profile of attendees against worker profile	3.3 4.3	A new learning Management system has been implemented with a reviewed and updated Equality and Diversity module As above monitoring systems are currently being implemented Owner – HRBP In Progress
Annual review	Establish best measure for review programme	Performance of policies monitored against PSED	3.3 3.4 3.5 4.3	Equality impact assessments completed as policies produced/reviewed Owner – CCG Supported by HRBP See Monitoring as above. In Progress
Staff surveys	The CCG to consider rolling out staff survey including questions on E&D	Understanding staff relationship with organisational culture to eliminate any institutional discrimination	3.4 3.6 4.3	CCG Staff survey drafted Owner – CCG Completed

Positive Action	<ol style="list-style-type: none"> 1. Monitor performance against policies to establish base line 2. Identify trends 3. Establish conditions for positive action 	<p>Challenge barriers if data/evidence identifies them</p> <p>Advance equality of opportunity.</p>	<p>3.2 3.5 3.1 3.3 3.5 4.1 4.3</p>	<p>HRBP is currently working with the Workforce Team to establish relevant monitoring systems for each of these key policies</p> <p>Awaiting Task and Finish Groups.</p> <p>Owner – HRBP</p> <p>In progress</p>
Implement NHS Workforce Race Equality Standard	<p>Implement and embed the 9 national Workforce Race Equality Standard indicators</p> <p>Establish conditions for Positive action</p>	<p>Eliminate Discrimination</p> <p>Advance Equality Of Opportunity</p>	<p>3.1 3.3 3.4 3.6 4.1 4.3</p>	<p>As NHS England guidance</p> <p>Completed</p>