

Equality Objectives Closedown

October 2017

Context

An area of compliance with the **Public Sector Equality Duty (PSED)**, requires Clinical Commissioning Groups (CCGs) to demonstrate 'due regard' to the three aims of the duty:

- eliminate unlawful discrimination;
- advance equality of opportunity between different groups and;
- foster good relations between different groups;

Due regard means that the CCG has given consideration to issues of equality and discrimination in any decision that may be affected by them. This process of consideration is:

- undertake prior to a decision;
- undertake with an 'open mind';
- continues throughout a project;
- focuses on the effects of a decision and actions to address the affects;

This is a valuable requirement that is seen as an integral and important part of the mechanisms for ensuring the fulfilment of the aims of anti-discrimination legislation set out in the Equality Act 2010.

One of the specific requirements that relates to the **PSED** information below is as follows:-

- prepare and publish specific and measurable equality objectives at least every four years;

The primary purpose of the objectives is to focus organisations on the outcomes to be achieved through advancing equality, rather than the written documents and processes to evidence legal compliance.

To be a trusted and inclusive organisation, Wolverhampton CCG must in both its commissioning activities and as an employer be able to demonstrate and evidence 'due regard' in compliance with the PSED as set out in the Equality Act 2010.

The main purpose of this report is to show what progress has been made and also close down the current equality objectives that have come to the end of their four year term, in readiness for the new equality objectives for the next four years, understanding if there is any activities that need to be moved forward to the new objectives due to be published March 2018 as part of the new legislative timeline.

Equality Objectives

1. To ensure that Leadership and Governance arrangements persist in offering high level assurance of equality.
2. Equality approaches are effectively included in key mechanisms of commissioning (such as business case development, procurement, contracting).
3. Equality Analysis becomes part of our organisational processes so that projects, policies, strategies, business cases, specifications and contracts have all been developed in consideration of equality, diversity and human rights issues.
4. To apply Goals 1 and 2 of the Equality Delivery System to an average of at least three patient pathways for each year of the strategy, and to demonstrate year on year improvements for Goals 3 and 4 (Staff and Leadership).
5. To regularly review and update the strategic action plan and equality objectives (on at least an annual basis) to ensure that it is providing appropriate targets for development and improvement.
6. To ensure all CCG staff receive basic training to ensure awareness of Equality Act 2010 responsibilities and the NHS Constitution, and that specific training on Equality Analysis and the Equality Delivery System is targeted to all staff who are involved in these processes.
7. To ensure that Equality and Diversity forms an ongoing part of our leadership and organisational development programmes.
8. To ensure that Equality and Diversity approaches are fully included in our engagement of people who use services and in our work with strategic partners and other stakeholders.
9. Improve accessibility of information and communication for people from statutorily 'protected groups' and other disadvantaged

Equality Objectives Action Plan – 2016

Actions	Narrative on Progress	Update	RAG Rating
1. To ensure that leadership and governance arrangements persist in offering high level assurance of equality.			Key
1.1 Review: <ul style="list-style-type: none"> - Project Definition document - Project Scoping Document - Project Preliminary Appraisal document - Equality Impact Assessment document - Equality Impact Assessment Guidance 	This activity was 2 fold to achieve the desired outcome. To enhance the current provisions around embedding equality requirements into commissioning. Firstly, the documents were reviewed to provide assurances that equality and inclusion are integral, as well as the governance arrangements. The reviewed process and governance arrangements were implemented on the 1 April 2016, to be reviewed within 3 months.	The 3 month review identified no real issues with the revised documentation and process. It did identify that more work needs to be done around demographic data and information about Wolverhampton and this has been rectified by the Joint Strategic Needs Analysis (JSNA).	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="background-color: red; color: white; padding: 5px; font-weight: bold;">R</div> <div style="background-color: yellow; color: black; padding: 5px; font-weight: bold;">A</div> <div style="background-color: green; color: white; padding: 5px; font-weight: bold;">G</div> </div> <div style="background-color: green; color: white; text-align: center; padding: 10px; font-weight: bold; margin-top: 5px;">Green</div>
1.2 Create an ethos of ownership of the process and legal obligations, to ensure 'due regard' can be demonstrated in both practice and process	Secondly, in principle both the Senior Management Team (SMT) and the Governing Body have agreed to adopt the 'Brown Principles' as an integral part of decision making. This will provide further assurance that equality considerations are seamlessly embedded within the core business of the organisation.	This work will be furthered as part of the 'Improvement and assessment framework' activity, but still requires clarity and documentary evidence	Amber
2. Equality approaches are effectively included in key mechanisms of commissioning (such as business case development, procurement, contracting).			
2.1 Equality requirements embedded into contracts of the CCG's large providers initially.	Criteria developed and implemented by contract managers. This provides assurance of meeting NHS Constitution, NHS Standard Contracts, NHS Outcomes Framework and Public Sector Equality Duty (PSED), as set out in the Equality act 2010.	As part of the contract equality monitoring, new separate guidance documents for the Contracts Team and the Provider have been drawn up in line with the contract changes that took place for April 2017. This included specific criteria for Schedule 6 which outlines the required information/evidence from providers to provide the CCG with assurances around compliance.	Green

Actions	Narrative on Progress	Update	RAG Rating
2. Equality approaches are effectively included in key mechanisms of commissioning (such as business case development, procurement, contracting) – Continued.			Key
2.2 Carry out monitoring of large providers to ensure they are meeting PSED on behalf of the CCG.	Investigations of websites, Equality Delivery System2 (EDS2) activity and Workforce Race Equality Standard (WRES) have been carried out to ensure compliance, that CCG providers are meeting their own equality duties. This work is completed but has identified further work is required with some providers specifically on websites. This will be addressed as part of future actions.	Continue with review of all providers, this will be a continuous annual review.	<div style="display: flex; justify-content: space-around; align-items: center;"> R A G </div> <div style="background-color: green; color: white; text-align: center; padding: 10px; font-weight: bold;">Green</div>
2.3 Ensure Commissioners carry out Equality Impact & Risk Assessments (EI&RA).	This is carried as and when providing assurance that all services commissioned or decommissioned will have considered equality impact on services, policy, practice or procedures and any action plan that needs to put in place to mitigate inequalities.	This is linked to the 1.1 Training has been scheduled for further assurance of consistency - October/November 2017	<div style="background-color: green; color: white; text-align: center; padding: 10px; font-weight: bold;">Green</div>
2.4 Complete a statement of intent and complete the WRES template for the CCG, as required by NHS England.	Completed by the October 2017 Deadline	Compliance checks of large providers are being carried out.	<div style="background-color: yellow; color: black; text-align: center; padding: 10px; font-weight: bold;">Amber</div>
3. Equality Analysis becomes part of our organisational processes so that projects, policies, strategies, business cases, specifications and contracts have all been developed in consideration of equality, diversity and human rights issues.			
3.1 Refresh all EI&RA documentation.	This will provide assurances of a robust process as part of the enhanced governance arrangements and compliance and systematically support the reduction of inequalities and provide further evidence and demonstration of compliance.	This is linked to the 1.1	<div style="background-color: yellow; color: black; text-align: center; padding: 10px; font-weight: bold;">Amber</div>

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3. Equality Analysis becomes part of our organisational processes so that projects, policies, strategies, business cases, specifications and contracts have all been developed in consideration of equality, diversity and human rights issues.			Key
3.2 Deliver EI&RA training	Training delivered, mop-up sessions due to be delivered before the end of April 2016 to capture staff who were unable to attend previous training. All staff will be fully aware of their role and responsibilities as part of this process, and become competent to complete EI&RA.	Training has been scheduled for further assurance of consistency - October/November 2017	<div style="display: flex; justify-content: space-around; align-items: center;"> R A G </div> <div style="background-color: green; color: white; text-align: center; padding: 5px; margin-top: 5px;">Green</div>
4. To apply Goals 1 and 2 of the Equality Delivery System to an average of at least three patient pathways for each year of the strategy, and to demonstrate year on year improvements for Goals 3 and 4 (Staff and Leadership)			
4.1 Implement the EDS2 across the organisations commissioning activity and staff focussed.	The CCG completed self-assessment and grading on Goal 3 – A representative and supported workforce. The CCG have decided to review the EDS2 methodology and process into to develop a productive approach to EDS2.	The EDS2 Portfolio focussing on all 4 goals and across the whole CCG has been published on the CCG website.	<div style="background-color: green; color: white; text-align: center; padding: 5px;">Green</div>
5. To regularly review and update the strategic action plan and equality objectives (on at least an annual basis) to ensure that it is providing appropriate targets for development and improvement.			
5.1 Present assurance reports to CCG Quality & Safety Committee and SMT.	Assurance reports have been represented. The complete strategy is due to be refreshed 2017.	The Equality and Inclusion Annual Report are scheduled on Quality and Safety Committee, SMTand Governing Body. Equality reports also go to other Boards as and when required.	<div style="background-color: green; color: white; text-align: center; padding: 5px;">Green</div>

Actions	Narrative on Progress	Update	RAG Rating
6. To ensure all CCG staff receive basic training to ensure awareness of Equality Act 2010 responsibilities and the NHS Constitution, and that specific training on Equality Analysis and the Equality Delivery System is targeted to all staff who are involved in these processes.			Key
6.1 Design and deliver Equality Act workshop training for staff, SMT/Governing body/Clinical networks	This will provide assurances that all staff and other professional stakeholders are aware of their responsibilities under the Equality Act 2010 and Human Rights, and will be able to apply this in their daily work practices. Planning is currently taking place.	Awaiting confirmation from Human Resources Business Partner (HRBP) if E&D Training is part of updated ESR system or whether face-to-face needs to be delivered.	<div style="display: flex; justify-content: space-around; align-items: center;"> R A G </div> <div style="background-color: orange; color: white; text-align: center; padding: 5px; margin-top: 5px;">Amber</div>
7. To ensure that Equality and Diversity forms an ongoing part of our leadership and organisational development programmes			
7.1 Equality and diversity requirements are incorporated where relevant and appropriate into leadership programme via organisational developments plans.	Map out equality work against organisational development plan activities. This will improve equality sensibility at senior management and Board level.	<p>Linked to 6.1 Formalise Equality Champions</p> <p>Enhance and formalise equality considerations made through the governance processes</p> <p>Develop communication opportunities for CCG Leaders and Senior Staff to share outcomes of delivering their commitment to inclusive practice and empowering the systems and processes to be inclusive.</p>	<div style="background-color: orange; color: white; text-align: center; padding: 10px;">Amber</div>
8. To ensure that equality and diversity approaches are fully included in our engagement of people who use services and in our work with strategic partners and other stakeholders.			
8.1 Develop an Equality & Diversity group that has a membership inclusive of the 9 protected characteristics.	The terms of reference have been developed and circulated to potential members. This will enhance E&D links with CCG programme of engagement and involving local communities in planning, developing, and delivery of services.	This forms part of joint working with Communications and Engagement Team.	<div style="background-color: green; color: white; text-align: center; padding: 10px;">Green</div>

Actions	Narrative on Progress	Update	RAG Rating
9. Improve accessibility of information and communication for people from statutorily 'protected groups' and other disadvantaged groups.			Key
9.1 WCCG to ensure that all its information can be provided in an accessible format for patients and communities.	CCG is able to provide communication on all its commissioning activity and health programmes in an accessible form for the benefit of its population. The Communications and Engagement Team have an established system.	This forms part of joint working with Communications and Engagement Team.	<div style="display: flex; justify-content: space-around; align-items: center;"> R A G </div> <div style="background-color: green; color: white; text-align: center; padding: 5px; margin-top: 5px;">Green</div>



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Date: **October 2017**

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