

NHS Lincolnshire Clinical Commissioning Group
Equality, Inclusion and Human Rights Action Plan 2020 – 23 (approved by Executive meeting 29/102020)

NHS Lincolnshire CCG Equality, Inclusion and Human Rights Action Plan April 2020 – 23

Note: Development of this action plan was delayed due to the Covid-19 situation, when key priorities from the beginning of April to mid-July focused mainly on addressing issues associated with Covid-19. Appendix 2 includes a summary of actions undertaken/proposed to support work around Covid-19 health inequalities, some of which have been embedded into Objective 5.

OBJECTIVE 1: Enhance workforce data and staff support

Work to improve the equality monitoring of workforce data, the recruitment of staff, board and committee members and support the progression of internal staff

	Actions	Timescales	Implementation responsibility	Strategy/policy link	Achieved/ outcome
1.1	Enhance the data quality held on CCG staff via ESR, through an updated data cleansed system to improve data recording and monitoring. <ul style="list-style-type: none"> • Review current categories for data collection and recording • develop common data set of categories/areas for collection/analysis • Implement the use of categories across different HR functions. 	March 2021	HR Equality leads EF members Executive	<ul style="list-style-type: none"> • EDS • Equality Act 2010 – PSED • NHS People Plan • Workforce/HR strategy 	
1.2	WRES delivery of annual submissions to NHSE and implementation of action plans <ul style="list-style-type: none"> • Review previous years action plan • Collect data for by June for 2020 WRES submission 	Submission August 2020	HR Executive Equality leads EF members	<ul style="list-style-type: none"> • EDS • Equality Act 2010 – PSED • NHS standard contract 	

	<ul style="list-style-type: none"> • Develop action plan around gaps identified • Seek approval for publication • Work to implement actions e.g. target positive action initiatives to enable the recruitment of staff from underrepresented groups • Assess Provider compliance to WRES. 	Action plan & approval Sept 2020 Oct 2020 – March 2021		<ul style="list-style-type: none"> • Workforce/HR strategy 	
1.3	<p>GPG reporting – CCG to submit gender pay gap data, develop and implement an action plan</p> <p>Note: Deadlines for this will be dependent on government deadlines associated with Covid -19 situation.</p>	TBC	HR Data analyst Executive	<ul style="list-style-type: none"> • National guidance • Workforce/HR strategy 	
1.4	<p>Work to develop staff networks to support staff from different protected characteristics</p> <ul style="list-style-type: none"> • Continue to link to ULHT staff networks • Develop questionnaire to assess whether there is an appetite for staff networks within the CCG • Prioritise the setting up of specific networks dependant on outcomes of the above assessment • Publicise networks to CCG staff • Develop TOR and network roles within CCG and actions. 	<p>March 2021</p> <p>Between April 2021 - 23</p>	Senior managers Equality leads HR EF members	EDS Equality Act 2010 PSED	

OBJECTIVE 2: Visible leaders to champion EQUALITY

Ensure leaders are committed to raising equality standards within the workplace, with providers and external stakeholders and diverse communities.

	Actions	Timescales	Implementation/Who	Strategy/policy link	Achieved/ outcome
2.1	<p>CCG Senior leaders to be at the forefront of engaging with staff and public and championing Equality issues</p> <ul style="list-style-type: none"> • Equalities updates to be a standard item at QPEC meetings • Commitment from Executive for a representative to be visible at such events e.g. LGBT conference etc. • Senior Leaders to front equality campaigns and workshops • Address equality issues in staff bulletins and community newsletters • Ensure providers comply with equality standards • Departmental Leader to have and own personal Equality targets for the year (focussed to their responsibilities). 	Ongoing 2020-23	Executive team Senior managers EF members QPEC	EDS Equality Act 2010 PSED NHS constitution	
2.2	<p>Line Managers to be more involved in implementing Equality actions/initiatives as part of their roles</p> <ul style="list-style-type: none"> • Provide information and guidance to managers regarding their responsibilities for Equalities within their teams 	Ongoing 2020-23	Executive Leads Managers HR Equality leads External trainers	EDS Equality Act 2010 PSED NHS constitution	

	<ul style="list-style-type: none"> Line Managers to raise equality issues and have discussions during team meetings Line Manager's competence in dealing with race equality matters to be supported through training and coaching, to raise confidence and awareness. 				
2.3	<p>Review and extend the Equality Forum to involve more senior staff</p> <ul style="list-style-type: none"> Executive lead to have leadership role on the Forum Senior manager/s as chair and vice chair. 	September 2020	Executive Senior managers	EDS Equality Act PSED	
2.4	<p>Support providers to address barriers to accessing services by patients</p> <ul style="list-style-type: none"> Extend EF to invite providers to meetings to discuss priority equality and health inequality issues Review/assess provider data focusing on key areas e.g. disparities around covid-19 test results/death rates etc. 	Nov 2020 Ongoing 2020-23	Managers Comms and Engagement leads Equality leads Providers Primary Care	EDS NHS constitution Equality Act 2010 PSED	
2.5	<p>Improve engagement with vulnerable groups/populations with regards to service change</p> <ul style="list-style-type: none"> Collect and analyse data on local population demographics Undertake comms and engagement health campaigns/exercises targeted at diverse populations Direct information at specific communities impacted adversely by issues related to the Health 	Sept 2020 Ongoing 2020-23	Managers Comms and Engagement leads Equality leads EF members Providers	EDS NHS constitution Equality Act 2010 PSED Comms and Engagement Strategy	

	inequalities agenda e.g. Covid-19 disparities <ul style="list-style-type: none"> Organise further system wide Diversity Listening events targeting disadvantaged groups within Lincs. 				
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OBJECTIVE 3: Strategy and Policy development and Equality training

Develop new CCG Equality strategy, policy and EIA template, and support staff through training on implementation of documents

	Actions	Timescales	Implementation/Who	Strategy/policy link	Achieved/ outcome
3.1	Produce an Equality Strategy for the New Lincolnshire CCG <ul style="list-style-type: none"> Gather relevant information about localities, Lincs demographics, workforce structures and goals Draft the strategy Undertake an EIA to ensure due regard to Equality PSED and Health Inequalities has been met Consult on the strategy with senior leaders, relevant staff and stakeholders Monitor strategy development work within the Equality Forum Take to relevant committee for approval Circulate information about strategy to all CCG staff and publish on CCG webpage. 	March 2021	Senior manager Executive lead Equality leads EF members HR Comms and Engagement Executive/QPEC	Corporate strategy Equality Act 2010 PSED	
3.2	Produce an Equality Policy for the New Lincolnshire CCG		Equality leads Line managers EF members	Corporate strategy Equality Act 2010 PSED	

	<ul style="list-style-type: none"> • Draft the policy and do an EIA to ensure compliance to the PSED • Consult with senior staff and HR • Agree contents of final draft including EIA with Equality Forum • Take to relevant committee for approval • Ensure staff are aware and understand the policy and how to implement it through training. 	<p>December 2020</p> <p>March 2021</p>	<p>HR Executive/QPEC</p>		
3.3	<p>Produce new EIA template and guidance for the single CCG</p> <ul style="list-style-type: none"> • Review current templates used and their appropriateness • Draft a new version and consult with Equality Forum and Polices group • Agree contents of final draft at Equality Forum and Polices group • Relevant committee to approve the new version of the EIA document • Ensure staff are aware of and understand how to implement it through briefings and training. 	<p>Nov/Dec 2020</p> <p>Dec 2020- Jan 2021</p>	<p>Equality Leads Senior Manager EF Executive</p>	<p>Equality Act 2010 PSED</p>	
3.4	<p>Assess current Equality training provision and staff professional development and introduce packages to enhance their knowledge and awareness</p> <ul style="list-style-type: none"> • Undertake skills analysis of CCG workforce from leaders to frontline staff • Collect information about current training provision 	<p>Jan 2021 – March 22</p>	<p>HR Equality leads Executive lead EF members</p>	<p>Workforce strategy/training policy Equality Act 2010 PSED equality /strategy policy</p>	

	<ul style="list-style-type: none"> • Provide advice on relevant Equality priority areas of training for CCG Workforce • Recommend/develop packages targeted at different levels of the organisation • Source relevant training providers to deliver training on specific Equality issues e.g. disability, gender reassignment etc. • Evaluate training outcomes and impact. 		External trainers		
3.5	<p>Improve the contents and uptake of Equality mandatory training for all staff</p> <ul style="list-style-type: none"> • HR to review current training with training provider to assess contents relevance and make suggestions for update • Assess uptake of staff completing training • Target staff who have not completed • Ensure all new staff participate. 	April 2021-March 2022	Training provider HR Equality leads Line managers	Workforce strategy/training policy Equality Act 2010 PSED Equality /strategy policy	

OBJECTIVE 4: Achieve and comply with national Equality Standards and relevant Charter marks

	Actions	Timescales	Implementation/Who	Strategy/policy link	Achieved/ outcome
4.1	<p>EDS v3 – All future work will be done in line with the new framework which will be released in 2020 by NHS England and piloted over the year. Implementation of the standard will include:</p> <ul style="list-style-type: none"> • Implementation plan with timeframes 	2020-23	Executive lead Line managers for different business areas EF members HR	<ul style="list-style-type: none"> • EDS • Equality Act 2010 – PSED • NHS standard contract 	

	<ul style="list-style-type: none"> • Involvement of senior staff • Training for managers • Assessment of service areas within EDS Domains • Consultation with assessors group and key stakeholders • Analysis of evidence • Production of report • Approval and publication <p>Note: due to Covid-19 situation the launch of EDS v3 may be further delayed, in which case, decisions will need to be taken to continue implementation of EDS2, as outlined above, either as assessment of whole standard or a focus on specific goals.</p>	March 2021	Comms and Engagement	<ul style="list-style-type: none"> • Workforce/HR strategy • Comms and Engagement strategy 	
4.2	<ul style="list-style-type: none"> • Disability Confident – to obtain Leader Status by 2022 • Update Mindful Employer • Update Carers awards • Research into and Identify other Equality Charter Marks. 	March 2022 Nov 2020 March 2021 2020-22	HR Comms and Engagement Equality leads	Equality Act 2010 PSED Workforce/HR strategy	

OBJECTIVE 5: Address BAME disparities in relation to Covid-19 – *additional objective agreed at QPEC meeting of 9/09/2020*
Implement actions within the new NHS Lincolnshire CCG to assess the disproportionate impact of Covid-19 on BAME staff and communities in line with the associated health inequalities issues raised in the PHE disparities report.

	Actions	Timescales	Implementation/Who	Strategy/policy link	Achieved/ outcome
5.1	<p>Actions with regards to the workforce:-</p> <ul style="list-style-type: none"> • Collect/analyse workforce data trends paying specific attention to higher bands and create initiatives to address the 	Mar 21 Mar 22 Mar 23	Executive Leads Line managers EF members	Equality Act 2010 PSED Health Inequalities Agenda	

	<p>under-representation of BAME staff at executive/senior level – relate to WRES work</p> <ul style="list-style-type: none"> • Encourage the participation of BAME staff in the decision making process of the CCG, through networks with access at Board level but also other means e.g. staff consultation and engagement forums and staff surveys • Recommend/organise training for all staff in a leadership role to help raise their awareness and confidence in having conversations with BAME staff about their circumstances (relate to training actions in objective 3) • Review the induction process with a view to include reference to the availability of additional support for all new and existing BAME staff • Conduct ongoing risk assessments on those BAME staff who may be at greater risk of infection and provide targeted support as required • Ensure that the CCG continues to conduct Equality Impact Assessments (EIA's) when reviewing existing and developing new workforce policies and practices to address any disparities that may exist with regards to BAME staff • Ensure all staff are kept up to date with BAME issues, developments and initiatives through regular communications of information and engagement exercises. 	<p>Ongoing 2020-23</p> <p>Jan 2021 – March 22</p> <p>Sept 2021</p> <p>Ongoing 2020-23</p> <p>Ongoing 2020-23</p> <p>Ongoing 2020-23</p>	<p>Comms and Engagement</p>	<p>EDS National disparities reports</p>	
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	Actions	Timescales	Implementation/Who	Strategy/policy link	Achieved/ outcome
5.2	<p>Actions with regards to the communities:-</p> <ul style="list-style-type: none"> • Review Lincolnshire wide demographics and health inequalities data to assess disparities and compare trends amongst different BAME communities and associated factors • Engage with our partner organisations across the STP/ICS to ensure there is a system wide approach to tackling inequalities across Lincolnshire. Focus on targeting support to specific geographical areas of the county where disparities among certain communities may be more prominent • Through communication and engagement exercises ensure that up to date information is distributed widely as possible and is accessible in different languages and formats as required. 	Ongoing 2020-23	Executive Line managers EF members Comms and Engagement Providers	Health Inequalities Agenda National disparities reports Equality Act PSED EDS	

Monitoring and Review of Action Plan

- **Equality Forum:** Bi-monthly meetings to provide updates on implementation of action plan, monitor progress and enable discussions around Equality work
- **QPEC:** Provide update reports, enable discussion and seek approvals quarterly
- **External Assessors Group (Patient Council):** Provide updates as part of EDS2 (new EDS v3) work on a 6 monthly basis
- **Patient Safety and Quality Assurance Meeting (Quality Focus):** Quarterly/6 monthly update. Once group is reinstated

NHS Lincolnshire CCG Equality, Inclusion and Human Rights Objectives - *Approved at the QPEC meeting of 15 June 2020*

Workforce data and staff support

- Enhance the data quality held on CCG staff via ESR, through an updated data cleansed system to improve data recording and monitoring
- WRES/WDES delivery of annual submissions to NHSE and implementation of action plans
- GPG reporting – dependant on the workforce numbers (threshold 250 staff), the new CCG will need to consider submitting gender pay gap data and so be responding to this data with an action plan.
- Introduce staff networks to support the development of staff from different protected characteristics

Visible leaders to champion Equality

- Leaders to be at the forefront of engaging with staff and public
- Managers to be more involved in implementing Equality actions/initiatives as part of their roles
- Review and extend the Equality Forum to involve more senior staff – Forum to act as an Equality monitoring, review and support network for the new CCG.
- Support providers to address barriers to accessing services to by patients
- Improve engagement with vulnerable groups/populations with regards to service change

Equality Strategy and policy development and training

- Assess current Equality training provision and staff professional development
- Improve the contents and uptake of Equality mandatory training for all staff
- Introduce more face to face training to support the work of staff from leaders to front line staff

Standards and Charter marks

- EDS version 3 – All future work will be done in line with the new framework which will be released in 2020 by NHS England and piloted over the year
- Disability Confident – to obtain Leader Status by 2022, and identify other relevant Equality Charter Marks

Equality Objective for Lincolnshire CCG to support people from BAME communities, including CCG staff, in response to national reports – Approved at QPEC meeting of 9 September 2020

Objective 5: Implement actions within the new NHS Lincolnshire CCG to assess the disproportionate impact of Covid 19 on BAME staff and communities in line with the associated health inequalities issues raised in the PHE disparities report.

Actions with regards to the workforce:-

- Collect/analyse workforce data trends paying specific attention to higher bands and create initiatives to address the under-representation of BAME staff at executive/senior level – relate to WRES work;
- Encourage the participation of BAME staff in the decision making process of the CCG, through networks with access at Board level but also other means e.g. staff consultation and engagement forums and staff surveys
- Organise training for all staff in a leadership role to help raise their awareness and confidence in having honest and difficult conversations with BAME staff about their circumstances
- Review the induction process with a view to include reference to the availability of additional support for all new and existing BAME staff;
- Conduct ongoing risk assessments on those BAME staff who may be at greater risk of infection and provide targeted support as required;
- Ensure that the CCG continues to conduct Equality Impact Assessments (EIA's) when reviewing existing and developing new workforce policies and practices to address any disparities that may exist with regards to BAME staff.
- Ensure all staff are kept up to date with BAME issues, developments and initiatives through regular communications and engagement of information

Actions with regards to the communities:-

- Review Lincolnshire wide demographics and health inequalities data to assess disparities and compare trends amongst different BAME communities and associated factors;
- Focus on targeting support to specific geographical areas of the county where disparities among certain communities may be more prominent;
- Engage with our partner organisations across the STP/ICS to ensure there is a system wide approach to tackling inequality across the Lincolnshire STP workforce
- Through communication and engagement exercises ensure that up to date information is distributed widely as possible and is accessible in different languages and formats as required – assessing the demographics of the areas being targeted prior to conducting exercise, helps to ascertain communication and engagement methods.

Acronyms used within the document

Acronym	Description
BAME	Black, Asian and Minority Ethnic
EDHR	Equality, Diversity and Human Rights
EDS2	Equality Delivery System 2
EDS v3	Equality Delivery System version 3
EF	Equality Forum
EIA	Equality Impact Assessment
EIHR	Equality, Inclusion and Human Rights
ESR	Electronic Staff Record
GPG	Gender Pay Gap
HR	Human Resources
ICS	Integrated Care System
LGBT	Lesbian, Gay, Bisexual and Transgender
NHSE	National Health Service England
PSED	Public Sector Equality Duty
QPEC	Quality Patient Experience Committee
STP	Sustainability and Transformation Partnerships
TOR	Terms of Reference
ULHT	United Lincolnshire Hospital Trust
WRES	Workforce Race Equality Standard
WDES	Workforce Disability Equality Standard

Update on what has been undertaken/achieved so far, April 2020 – September 2020, in relation to the equality action plan

- Produced Equality Guidance on Covid-19 as a support tool to help CCG to respond to diverse needs and requirements of different staff and communities
- Conducted (EIA) Equality Impact assessment on frontline staff to assess any disparities relating to different protected characteristics. This work was to enable the CCG to provide support to staff within these groups if required
- Objectives for 2020 – 23 were agreed at QPEC meeting of 15 June 2020, where it was also suggested and agreed that an additional objective and actions be developed to support BAME staff and communities in Lincolnshire, relating specifically to the recommendations of the Public Health England report '***Beyond the data: Understanding the impact of COVID-19 on BAME groups.***' The additional objective was agreed at the 9 September QPEC meeting
- Worked jointly with ULHT to re-establish the BAME staff network and continuing to encourage opportunities for more staff to join, raise issues and recommend actions
- Developed the Equality Inclusion and Human Rights webpage for the New Lincolnshire CCG so that we can comply with the Public Sector Equality Duty and publish the work we do in relation to implementing different equality standards including the Equality Delivery System (EDS2)
- Targeted comms and engagement exercises around Covid -19 and other health priorities, as wide as possible, to ensure the messages are getting out to different communities as well as through the new Lincolnshire CCG Website
- Working with our providers to ensure they are communicating all information in accessible formats in line with the Accessible Information Standard
- Re-established the Equality Forum for the Lincolnshire CCG to ensure we are continually monitoring work outcomes for Equality, Inclusion and Human Rights within the CCG and our providers
- 4 into 1 CCG EIA has been brought up to date and a report has been produced for publication
- Regular equality updates are given in the staff bulletin
- WRES data submitted, report/action plan produced and published
- Charter marks: Disability Confident – Employer Status achieved, work being undertaken to continue with Mindful Employer and Carers Award.