

HSI21/044

GOVERNING BODY

Title of paper	Organisational Equality Objectives		
Agenda item	9	Date of meeting	8 September 2021
Executive lead	Fiona Howarth, Chief of Staff	Sponsor (GP Board member or Executive Director)	Fiona Howarth, Chief of Staff
Author	Claire Pond, Equality, Diversity and Inclusion Lead		

Purpose	For decision	<input checked="" type="checkbox"/>
	To ratify	<input type="checkbox"/>
	To discuss	<input type="checkbox"/>
	To note	<input type="checkbox"/>

Link to strategic objective	Operational service delivery Supporting people and teams Transforming services Strategic planning and engagement Developing our Integrated Care System
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Executive Summary

This paper addresses the requirement for the Hampshire, Southampton and Isle of Wight Clinical Commissioning Group (CCG) to comply with the public sector equality duty. Specifically, to *'Prepare and publish one or more objectives which they feel they should achieve in order to meet any of the three aims of the general equality duty.'*

The paper also provides background information to clarify the legislation relating to equality objectives, how these are set by NHS organisations and the impact of the changing NHS landscape on the development of CCG equality objectives.

There are six proposed equality objectives for 2021/22, which the Governing Body is asked to consider and approve. These were discussed and amended by the CCG Equality, Diversity and Inclusion Steering Group in May and June 2021 and approved by the Portsmouth CCG Clinical Executive in July 2021.

In summary, they are:

Objective 1: Ensure the CCG fully understands and fulfils its responsibilities for equality and diversity, in order to become a nationally recognised leader on equality, diversity and inclusion.

Objective 2: Work in partnership with local stakeholders and embed a multiagency approach to the delivery of healthcare services.

Objective 3: Improve access to healthcare for everyone, both routinely and when they need prompt medical help but it is not a life-threatening situation.

Objective 4: Engage with diverse communities and consult with them when undertaking equality impact assessments and other commissioning activities.

Objective 5: Strengthen commissioning and partnership working so that the communities we serve feel informed and supported to be as involved as they wish to be in decisions about their care.

Objective 6: Work with all levels of staff to ensure the CCG have inclusive leadership and a representative and supported workforce.

Recommendations	<p>The CCG Governing Body is asked to:</p> <ul style="list-style-type: none"> • Agree the proposed approach to comply with the Public Sector Equality Duty • Consider and approve the proposed equality objectives for the remainder of 2021/22 • Approve a full review and consultation process to develop equality objectives using the EDS2 framework to be in place from April 2022.
Publication	<p>Include on public website ✓</p>

Please provide details on the impact of following aspects	
Equality and quality impact assessment	As detailed in the paper. The proposed equality objectives are intended to have a positive equality impact for community and staff groups with protected characteristics.
Patient and stakeholder engagement	The proposed objectives have been derived from those of the predecessor CCGs which were informed by patient and stakeholder feedback. Consultation is planned for 2022.
Financial impact, legal implications and risk	Investment of staff time in delivery of the objectives.
Data protection impact assessment	None specific to the agreement of the objectives. Activities required to achieve the objectives may require a specific impact assessment.

Governance and Reporting- which other meeting has this paper been discussed		
Committee Name	Date discussed	Outcome
NHS Portsmouth CCG Governing Body	To be considered on 15 September 2021	

Organisational Equality Objectives

1. Summary

- 1.1 This paper addresses the requirement for Hampshire, Southampton and Isle of Wight Clinical Commissioning Group (CCG) to comply with the public sector equality duty. Specifically, that is to: *Prepare and publish one or more objectives which they feel they should achieve in order to meet any of the three aims of the general equality duty.*
- 1.2 The paper also provides background information to clarify the legislation relating to equality objectives, how these are set by NHS organisations and the impact of the changing NHS landscape and how it impacts the development of CCG equality objectives.
- 1.3 There are six proposed equality objectives for 2021/22, which the CCG Governing Body are asked to approve. The proposed equality objectives were discussed and amended by the CCG Equality, Diversity and Inclusion Steering Group in May and June 2021 and approved by the Portsmouth CCG Clinical Executive in July 2021.

2. Context

2.1 Legislation

The Public Sector Equality Duty involves the preparation and publication of objectives to help public sector organisations perform against the three aims of the general equality duty. The aims are that, in carrying out its functions, an organisation has due regard to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act
- Advance equality of opportunity between people who do and do not share a relevant protected characteristic
- Foster good relations between people who do and do not share a relevant protected characteristic.

In setting one or more objectives, organisations must:

- Ensure the equality objectives are specific and measurable
- Publish the objectives so that they are accessible to the public

The aim is to help an organisation identify, prioritise and focus on equality issues that will achieve improvements in service delivery, employment and policy making. Objectives should be proportionate to the size and role of the organisation, whilst also depending on the relevance of equality and good relations to that organisation. Larger organisations are likely to set a greater number of equality objectives across a broader range of issues.

2.2 NHS Organisations and Equality Objectives

Nationally, NHS organisations use the NHS Equality Delivery System (EDS2) to develop equality objectives. The EDS2 should be undertaken at least every four years.

The EDS2 is a framework of 18 outcomes within four goals. It is applied to the performance of an NHS organisation's specific roles and responsibilities. It requires partnership working with local stakeholders (voluntary and community sector partners, local people and staff) to analyse performance, agree grading against each outcome, and agree equality objectives and any immediate plans.

Grading is measured against performance in relation to the protected characteristics defined under the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation). Other identified disadvantaged groups should also be included. These may be people who are homeless, living in poverty, long-term unemployed, in stigmatised occupations (such as prostitution), and geographically isolated. Once agreed with stakeholders, equality objectives are integrated into mainstream business planning. EDS2 grades and equality objectives and plans are then published, usually on the NHS organisation's website.

EDS2 therefore has several stages to include governance, identifying local interests, consulting and engagement with a wide range of stakeholders, compiling evidence, analysing performance and agreeing grades with stakeholders.

2.3 The changing NHS landscape

The predecessor CCGs that merged to become Hampshire, Southampton and Isle of Wight CCG in April 2021 and Portsmouth CCG completed the EDS2 framework in 2017 (West Hampshire CCG in 2019). The predecessor CCGs were: Fareham and Gosport CCG, Isle of Wight CCG, North Hampshire CCG, South Eastern Hampshire CCG, Southampton City CCG, and West Hampshire CCG.

Equality objectives adopted by each organisation can be grouped as follows:

- Corporate equality objectives relate to CCGs being legally compliant with equalities legislation, completing Equality Impact Assessments, building relationships and working in partnership with local stakeholders, and embedding a multiagency approach to delivery.
- Commissioning equality objectives relate to improving the access to and outcome of healthcare including commissioned self-help programmes and ensuring equitable health status for those that experience inequalities. It also includes ensuring providers progress against contractual requirements relating to equity of access and non-discrimination.
- Communications equality objectives relate to strengthening consultation and engagement, to ensure inclusivity of informed and supported communities.
- Workforce equality objectives relate to having a representative and supported workforce that is free from discrimination and has an inclusive leadership.

Subject to legislation, the dissolution of the CCG is expected to occur on 31 March 2022, with its functions and responsibilities (and those of Portsmouth CCG) being transferred to a new statutory body for the Integrated Care System for Hampshire and the Isle of Wight.

Given the proposed legislative changes, the similarity between existing objectives across the predecessor CCGs, and the time it will take to develop and engage on new objectives a pragmatic approach is being proposed for 2021/22.

3. Proposed Equality Objectives 2021/22

A set of equality objectives have been developed for 2021/22 based on existing ones. These are proposed for both Hampshire, Southampton and Isle of Wight CCG and Portsmouth CCG:

- 3.1 **Objective 1:** Ensure the CCG fully understands and fulfils its responsibilities for equality and diversity, in order to become a nationally recognised leader on equality, diversity and inclusion. This will include:
- Timely Equality Impact Assessments whenever new projects, proposals, policies, commissioning decisions and strategies are being developed
 - Making progress against and completing actions from the findings of the 2019/20 NHS Workforce Race Equality Standard
 - Implementation of the NHS Workforce Disability Equality Standard
 - Reducing and reporting on the Gender Pay Gap.
- 3.2 **Objective 2:** Work in partnership with local stakeholders and embed a multiagency approach to the delivery of healthcare services. This involves addressing health inequalities in access to services and health outcomes for identified groups and localities.
- 3.3 **Objective 3:** Improve access to healthcare for everyone, both routinely and when they need prompt medical help but it is not a life-threatening situation. Achieve year on year improvement in bringing primary, community and adult social care together with specialists from local hospitals and third sector organisations as a single extended primary care team.
- 3.4 **Objective 4:** Engage with diverse communities and consult with them when undertaking equality impact assessments and other commissioning activities. There will be a particular focus on groups and in localities that face specific inequalities in health and health outcomes.
- 3.5 **Objective 5:** Strengthen commissioning and partnership working so that the communities we serve feel informed and supported to be as involved as they wish to be in decisions about their care.
- 3.6 **Objective 6:** Work with all levels of staff to ensure the CCG have inclusive leadership and a representative and supported workforce. This will include:
- Developing and implementing a plan to achieve the national 6 Key Actions to Overhaul Recruitment and Promotion for staff from ethnic minority backgrounds

- Calculating the Race Disparity Ratio for the new organisation and developing an action plan based on the findings
- Implement a new workforce equality dashboard developed in partnership with the Commissioning Support Unit (CSU)
- Implement collection of disaggregated data for staff access to training and development opportunities, promotion and case work
- Establishing a staff network for employees with health conditions and disabilities, building on current work to strengthen staff partnership arrangements.

3.7 The proposed equality objectives were discussed and amended by the CCG Equality, Diversity and Inclusion Steering Group in May and June 2021 and approved by the Portsmouth CCG Clinical Executive in July 2021.

4. Next steps

Evidence will be gather of progress on equality and inclusion during Autumn 2021, which will be used as a basis for consultation with staff, patients and communities, using the EDS2 framework in early 2022. This EDS2 grading, in partnership with staff and community representatives, will provide the development of long-term equality objectives for the ICS when it becomes a statutory body from 1 April 2022 (subject to legislative changes).

5. Conclusion

5.1 Under equalities legislation the CCG is required to have equality objectives in order to meet the three aims of the Public Sector Equality Duty.

5.2 The time required to develop new equality objectives will take some months, from the planning stages through to analysis of available data and consultation and engagement with staff and stakeholders.

5.3 As some equality objectives from predecessor organisations remain relevant, they could be applied to the CCG as an interim measure whilst working towards the development of a new set of equality objectives for April 2022.

6. Recommendation

6.1 It is recommended that the CCG Governing Body:

- Agrees the proposed equality objectives for the remainder of 2021/22
- Approves a full review and consultation process to develop equality objectives using the EDS2 framework for April 2022 onwards.

The proposed equality objectives will be included in a similar paper to be considered by Portsmouth CCG.

References

1. A refreshed Equality Delivery System for the NHS: EDS2 Making sure that everyone counts. November 2013: [eds-nov131.pdf \(england.nhs.uk\)](#)
2. Equality and Human Rights Commissioning (2014) *Objectives and the Equality Duty: A Guide for Public Authorities. England (and non-devolved public authorities in Scotland and Wales):* https://www.equalityhumanrights.com/sites/default/files/equality_objectives_and_the_equality_duty.pdf
3. Equality Objectives 2017-2020:
 - Fareham and Gosport and South Eastern Hampshire CCGs
 - Isle of Wight CCG
 - North Hampshire CCG
 - Portsmouth CCG
 - Southampton CCG
 - West Hampshire CCG
4. Evaluation of the Equality Delivery System (EDS) for the NHS: [Microsoft Word - EDS Final Report 29 October \(england.nhs.uk\)](#)
5. Reference: EDS refresh update report (ND): <https://www.england.nhs.uk/wp-content/uploads/2019/07/EDC02-EDS-refresh-update-report.pdf>
6. The King's Fund (2020) Integrated care systems explained: making sense of systems, places and neighbourhoods. 20 April: <https://www.kingsfund.org.uk/publications/integrated-care-systems-explained>
7. The King's Fund (2021) The Health and Social Care White Paper Explained. 09 March: <https://www.kingsfund.org.uk/publications/health-social-care-white-paper-explained>

ANNEX 1

NHS Equality Delivery System 2: Goals and outcomes	
Goal	Outcome
1. Better health outcomes for all	1.1 Services are commissioned, procured, designed and delivered to meet the health needs of local communities
	1.2 Individual people's health needs are assessed and met in appropriate and effective ways
	1.3 Transitions from one service to another, for people on care pathways, are made smoothly with everyone well-informed
	1.4 When people use NHS services their safety is prioritised and they are free from mistakes, mistreatment and abuse
	1.5 Screening, vaccination and other health promotion services reach and benefit all local communities
2. 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
	2.2 People are informed and supported to be as involved as they wish to be in decisions about their care
	2.3 People report positive experiences of the NHS.
	2.4 People's complaints about services are handled respectfully and efficiently
3. A representative and supported workforce	3.1 Fair NHS recruitment and selection processes lead to a more representative workforce at all levels.
	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.
	3.3 Training and development opportunities are taken up and positively evaluated by all staff.
	3.4 When at work, staff are free from abuse, harassment, bullying and violence from any source
	3.5 Flexible working options are available to all staff consistent with the needs of the service and the way people lead their lives.
	3.6 Staff report positive experiences of their membership of the workforce.
4. Inclusive Leadership	4.1 Boards and senior leaders routinely demonstrate their commitment to promoting equality within and beyond their organisations.
	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.
	4.3 Middle managers and other line managers support their staff to work in culturally competent ways within a work environment free from discrimination.