

NHS North Lincolnshire CCG Equality Information Report 2019/20

1. Accessibility Statement

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Glossary of terms and abbreviations	
AIS	Accessible Information Standard
CCG	Clinical Commissioning Group
EDS	Equality Delivery System
E&I	Equality and Inclusion
EqlA	Equality Impact Assessment
PCAG	Patient and Community Assurance Group
SLT	Senior Leadership Team
WDES	Workforce Disability Equality Standard
WRES	Workforce Race Equality Standard

2. Introduction

The CCG is committed to promoting and embracing equality, diversity and inclusion, both as an employer and as a commissioner of health care services for our local population.

This equality information report demonstrates how NHS North Lincolnshire Commissioning Group (CCG) is meeting its public sector equality duties and NHS England equality standards. The report will outline progress against our equality programme of work, as well as identify areas that need further development. We recognise this is an on-going journey of development and improvement and welcome feedback and views on how we are doing.

This report will:

- Set out our equality public sector duties and how we have responded to these
- Demonstrate how we are paying due regard to NHS England Equality Standards, including the Workforce Race Equality Standard (WRES), the Workforce Disability Equality Standard (WDES), the Accessible Information Standard (AIS) and the Equality Delivery System (EDS)
- Set out our governance arrangements for delivering our equality objectives and reviewing performance
- Highlight achievements and progress against our equality objectives for 2017 - 2021
- Identify areas where improvement or progress is still needed
- Set out our priorities for 2020/2021

3. Legal Context and Equality Objectives

NHS North Lincolnshire Clinical Commissioning Group is committed to promoting equality and eliminating discrimination as an employer, and in ensuring the services we commission are accessible and inclusive. We recognise our duties under the Human Rights Act 1998 and the Equality Act 2010, including the Public Sector General Equality Duty to pay due regard to:

1. Eliminating unlawful discrimination, harassment and victimisation. This includes sexual harassment, direct and indirect discrimination on the grounds of a protected characteristic. The protected characteristics defined by the Equality Act are age, disability, gender reassignment,

marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation (further defined in 3.2 below).

2. Advancing equality of opportunity between people who share a protected characteristic and people who do not share it. This means:
 - Removing or minimising disadvantage experienced by people due to their personal characteristics
 - Meeting the needs of people with protected characteristics
 - Encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.
3. Fostering good relations between people who share a protected characteristic and people who do not share it, which means:
 - Tackling prejudice, with relevant information and reducing stigma
 - Promoting understanding between people who share a protected characteristic and others who do not.

Having due regard means considering the above in all the decision making, including:

- How the organisation acts as an employer
- Developing, reviewing and evaluating policies
- Designing, delivering and reviewing services
- Procuring and commissioning
- Providing equitable access to services.

The specific equality duties were updated by The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017. These regulations introduced requirements for public bodies to publish information in relation to gender pay equality and the annual publishing of equality information.

3.1 The specific duties are:

1. Gender pay gap reporting:
 - a. *Applicable to all public bodies with 250 or more employees*
 - b. *Utilising data from 31st March 2017 to analyse and publish by 30th March 2018 and annually thereafter*

- c. *Publish the information in a manner that is accessible to all its employees and to the public, for a period of at least three years beginning with the date of publication.*
2. Publication of information demonstrating compliance with s149(1) Equality Act 2010:
 - a. *Publication must include information relating to persons who share a relevant protected characteristic who are;*
 - i. *its employees (providing it employs 150 or more employees);*
 - ii. *other persons affected by its policies or practices.*
 - b. *Publish information not later than 30th March 2020.*
 - c. *Subsequently at intervals of not greater than one year beginning with the date of last publication*
3. Preparation and publication of one or more, specific and measurable, Equality Objectives;
 - a. *Published not later than 30 March 2020 (aligning to any current Equality Objective commitments).*
 - b. *Subsequently at intervals of not greater than four years beginning with the date of last publication.*

3.2 Protected Characteristics

The protected characteristics referred to in the Act are:

- **Age**, which refers to a person of any age group
- **Disability**, including persons with a physical or mental impairment where the impairment has a substantial long-term adverse effect on that person's ability to carry out day-to-day activities
- **Sex**, refers to a man or a woman
- **Gender reassignment**, which refers to a person proposing to or has undergone a process in relation to physiological or other attributes of sex, with the aim of aligning gender identity
- **Pregnancy and maternity**, this includes protection from discrimination when someone is pregnant, or after they have given birth. It includes protection for breastfeeding mothers

- **Race**, including ethnic or national origins, colour or nationality
- **Religion or belief**, including a lack of religion or belief, and where belief includes any religious or philosophical belief
- **Sexual orientation**, meaning a person's sexual orientation towards persons of the same sex, persons of the opposite sex and persons of either sex
- **Marriage and civil partnership**, refers to marital or civil partnership status, but in terms of assessing equality impact, only has relevance when a policy or decision includes criteria related to a person's marital or civil partnership status.

4. The function of the CCG

NHS North Lincolnshire Clinical Commissioning Group (CCG) is responsible for planning and paying for healthcare services in the area. Our ambition is to help local people live healthier lives and to make sure that when people do require health treatment, they receive the best possible standard of care.

Where appropriate, we will jointly commission services with partners such as neighbouring North East Lincolnshire CCG or North Lincolnshire Council. The main health provider organisations that we have contractual arrangements for services with are:

- Northern Lincolnshire and Goole NHS Foundation Trust
- Rotherham, Doncaster and South Humber NHS Foundation Trust
- East Midlands Ambulance Service NHS Trust

4.1 Patient and Public Engagement

We work with Healthwatch North Lincolnshire, the independent champion for local people who use health and social care services and jointly host our local Patient Participation Group (PPG).

Our patient network, Embrace, provides us with a network for sharing key messages and engagement opportunities to enable people to be more closely involved in shaping local services.

To help us understand how well we are supporting or providing services fairly to all groups of people, the CCG carries out equality monitoring of attendance at public engagement events, membership of Patient and Community Assurance Group (PCAG) and Embrace and participation in our surveys.

5. NHS England Equality Standards

5.1 Equality Delivery System (EDS)

As set out in the section above, our equality objectives were developed using the EDS as a framework to engage with local interest groups and listen to their experiences. Progress against the objectives will be monitored by the CCG throughout next year and links will be attached to this report demonstrating progress.

The CCG has awaited the anticipated launch of EDS3, which appears to have been delayed by NHS England. We will continue to develop our EDS engagement plan using EDS2 as framework.

5.2 Workforce Race Equality Standard (WRES)

The WRES requires organisations to demonstrate progress against a number of indicators of workforce equality, including a specific indicator to address the low levels of BME Board representation. We recognise our role in asking providers to report on their performance against the WRES framework from 1 July 2015, as well as paying due regard to the standard in its own workforce practices.

Paying due regard to WRES as an employer and a commissioner is reflected in our Equality and Inclusion (E&I) Action Plan.

5.3 Workforce Disability Equality Standard (WDES)

The WDES is a data-based standard that uses a series of measures (Metrics) to improve the experiences of Disabled staff in the NHS. The WDES is mandated by the NHS Standard Contract and applies to all NHS Trusts and Foundation Trusts from April 2019.

Mandatory reporting on WDES is restricted to NHS Trusts and Foundation Trusts for the first two years of implementation. The CCG will submit its first WDES report in 2020, and will seek assurance from our Trust providers that they are meeting this standard, including identifying and progressing action plans.

5.4 Accessible Information Standard

The CCG meets this standard by providing a range of communication adjustments to the public who wish to engage directly with the CCG (see: <https://northlincolnshireccg.nhs.uk/tell-us-what-you-think/equality-and-diversity/>).

5.5 Provider Assurance

A review of compliance with Public Sector Equality Duty and NHS Equality Standards was undertaken across the CCG's main providers in June 2019. An outcome report has submitted to the CCG's Quality, Performance & Finance Committee and feedback was provided to providers via contract management process.

6. Governance and Management Arrangements

The current structure to support equality and inclusion (E&I) in the CCG:

- Executive leadership for equality & inclusion, held by the Director of Nursing and Quality
- The operational lead for E&I is held by the Head of Governance
- Non-executive leadership provided by the CCG's Lay Member for E&I
- An E&I Sub-committee, representation includes the roles above, along with leads from HR, Commissioning & Quality and Communications and Engagement (the CCG is working to improve attendance at the sub-committee).
- E&I Sub-committee reports to the Quality, Performance & Finance Committee which reports to the Governing Body

The CCG also works with partners and stakeholders to strengthen its E&I practice (for example through the North Lincolnshire E&I Forum).

7. Reporting Information

7.1 Gender Pay Gap Reporting

The CCG employs 59 staff as at December 2019, and therefore is not subject to this reporting duty. However, we do regularly analyse our workforce data, including pay band by gender. Salaries are reviewed by our Remuneration Committee, which follows national guidelines and best practice. Our [Annual Report](#) includes a salary and information report, which lists the salaries received by members of the CCG Board.

7.2 Workforce Reporting

As above, the workforce reporting duty applies to employers with more than 150 staff. However, we do capture and analyse data relating to the protected characteristics of staff and our Senior Leader Team.

7.3 Information about people affected by the CCG

North Lincolnshire is home to 171,000 people, a population increase of 5.2% since 2007. This is a slower rate of increase than nationally. Growth in population is not evident across all demographic groups; the working age population is reducing and the 65+ population is increasing¹.

7.4 Equality Objectives

Our equality objectives were developed through engagement with staff and local interest groups primarily through implementing the Equality Delivery System (EDS2).

Our equality objectives for 2017- 2020 are:

1. The CCG will engage and involve, with due regard, local people, communities and stakeholders (representing the Equality Act 2010 Protected Characteristics) when commissioning, designing and evaluating services throughout the year.
2. The CCG will demonstrate; and report in the annual report each year; it is a fair and inclusive employer that recognises the value of diversity.
3. The CCG will continue to embed equality and diversity principles by developing and supporting all staff and Governing Body members to promote and champion inclusion in all aspects of the CCGs work.

The CCG has a comprehensive E&I Action Plan to meet and progress these objectives and ensure that we are meeting our Public Sector Equality Duties and NHS England Equality Standards.

7.4.1 Summary of progress

The CCG has made progress in the following areas:

- Robust assessment of CCG compliance against the EDS2 outcome goals;
- CCG accreditation with Disability Confident;
- CCG accreditation with Mindful Employer scheme;
- The development of a staff forum, with a focus on staff wellbeing
- Comprehensive review of compliance with the Equality Duty across the CCG main providers;
- Initial progress made with WRES;

¹ North Lincolnshire Integrated Strategic Assessment, 2019

- Approval and implementation of the CCG Equality and Inclusion Policy;
- An increase in the number of commissioning decisions, including service spec, projects and policies, where equality impact assessments have been completed.
- A shared impact assessment screening tool has been developed across the 3 Humber CCGs (North Lincolnshire, Hull, East Riding). Further peer review and sharing of good practice will strengthen the implementation of this.

There have been changes which have delayed progress in the following areas and the CCG recognises the need to progress these:

- The development of the equalities reference group as a forum to raise equality concerns and feed into equality impact assessments.
- Implementing the Equality Delivery System, particularly in terms of engagement with local interest groups and working with providers to identify services to focus on
- Developing equality objectives for 2020 – 2023
- Ensuring compliance with the Accessible Information Standard
- CCG Peer review of CCGs E&I governance arrangements
- E&I staff training
- Updating equality information on the CCG website

These areas for development have been addressed as a priority, with a recent independent assessment providing recommendations to provide the momentum and capacity to make significant progress in 2020/1.

7.5 Priorities for 2020/21

Priorities for the next period include:

- Identifying equality objectives for 2021 & beyond
- Increasing organisational capacity to progress the E&I Action Plan
- Strengthened relationships on E&I both within the organisation and with our strategic partners
- Implementation of EDS
- Staff and Governing Body development on E&I

- Continued review and strengthening of EqlA review, sign-off and assurance process

8. Have your say

If you have any feedback about this report, or wish to raise any concerns please contact us, using the contact information given in section 1, page 1 of this report.