

# Equality and Inclusion Annual Report

## 2017/18



MIDLANDS AND LANCASHIRE  
COMMISSIONING SUPPORT UNIT

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## Executive Summary

Promoting equality is at the heart of NHS Wirral CCG values, ensuring that we commission services that are appropriate and accessible. No community or group should be disadvantaged or discriminated against by the services we put in place to improve health outcomes. This means that everyone on Wirral should have equal access to NHS information, services and buildings.

We work internally and in partnership with our providers, community and voluntary sector and other key organisations to ensure that we meet the requirements of the Equality Act 2010.

At NHS Wirral CCG, we know that not all people access or take up services in the same way, and we want to try to take reasonable steps to accommodate these different needs, particularly for vulnerable protected groups. We annually publish an Equality and Inclusion report to show what we are doing to ensure that our services and employment opportunities are fair and accessible to all.

There is clear evidence that people's health, their access to and experiences of health services are affected by their age, gender, race, sex, sexual orientation, religion/belief, transgender, disability, marital/civil partnership status, pregnancy/maternity status in addition to other factors such as low income or unemployment. Wirral CCG commissions services that meet the needs of all its communities; improving access and outcomes for residents and communities throughout the area.

The CCG takes equality and diversity seriously and is committed to embedding best practices in this regard into all aspects of the organisation and its work streams. This report outlines the CCG's progress and work undertaken in 2017/18 in incorporating Equality and Inclusion in all its functions.

The report includes:

- The Legal duties for Equality and Inclusion.
- The CCG's in year progress regarding Equality and Inclusion.
- CCG's Equality Delivery System Public Grading Assessment
- The CCG's Equality and Inclusion Strategy and Equality Objectives

## Legal Duties for Equality and Inclusion

There are several legal duties which underpin the Equality and Inclusion work including:

- The NHS Constitution

The NHS Constitution Principles states that:

*'The NHS provides a comprehensive service, available to all irrespective of age,*

*disability, sex (gender), race, sexual orientation, gender reassignment, religion, belief, pregnancy and maternity or civil partnership status. The service is designed to improve, prevent, diagnose and treat both physical and mental health problems with equal regard. It has a duty to each and every individual that it serves and must respect their human rights. At the same time, it has a wider social duty to promote equality through services it provides and to pay particular attention to groups or sections of society where improvements in health and life expectancy are not keeping pace with the rest of the population.'*

- The Equality Act 2010

The Equality Act 2010 replaced previous anti-discrimination laws and place key duties on statutory organisations that provide public services. The general equality duty is intended to drive progress towards equality for all, by placing a responsibility on bodies subject to the duty to consider how they can work to tackle systemic discrimination and disadvantage affecting people with protected characteristics. It protects people from unfavourable treatment and discrimination and this refers particularly to people from the following categories known as protected characteristics:

- Age
- Disability
- Sex (Gender)
- Sexual Orientation
- Gender Reassignment
- Race including national identity and ethnicity
- Religion or belief
- Pregnancy and maternity
- Marriage and Civil Partnership

We additionally pay due regard to the needs of carers, homeless, people with low incomes and military veterans, when making commissioning decisions.

- General Duties

Section 149 of the Equality Act 2010 requires us to demonstrate compliance with the 'Public Sector Equality Duty' which places a statutory duty on the CCG to address:

- Eliminating unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not

- Specific Duties

Publish information to demonstrate their compliance with the Equality Duty, at least annually Set equality objectives, at least every four years

- Human Rights Act

The CCG has, through the Equality and Inclusion training and Equality Impact and Risk

Assessment completion, ensured that we undertake Human Rights screening on our entire commissioning activity. All Human Rights Screening outcomes are embedded into the Equality Impact and Risk Assessment for the commissioner consideration.

- Public Sector Equality Duties (PSED)

The PSED consists of both general and specific duties, the broad aim of the general equality duty is to integrate consideration of the advancement of equality into the day-to-day business of all bodies subject to the duty. Above all, we must be able to demonstrate that we have paid 'due regard' to the needs of different groups of people.

## Achievements in 2017/18

### Communication and engagement

Most of the CCG engagement activity has been centred on formal consultations as we deal with the challenges of meeting rising demand for healthcare services.

These consultations have been in relation to a number of services as follows:

- Procedures of Lower Clinical Value
- Self-Care Policy (Prescribing)
- Gluten free food prescribing
- Products of Lower Clinical Value
- Homeopathy and Iscador Services

Recognising its statutory duty to engage and consult, the CCG introduced a new engagement and consultation framework. This has been applied to the above workstreams and places an important emphasis on the need to assess the impact of any proposals on groups with protected characteristics and complete a comprehensive stakeholder mapping exercise to align engagement during consultation.

This approach has ensured that when post consultation decisions have been made by the CCG that they are reflective of the impact on diverse communities. An example of this is the Service Review Consultation which sought direct feedback on some proposals from Wirral Change (Black, Asian and Minority Ethnic), the Wirral Multicultural Organisation (WMO) and groups representing those seeking fertility treatment. This reflects that the CCG is mindful and responsive in its assessment and decision making.

Beyond the workstreams detailed above, the CCG has also developed a strategy for people with a Learning Disability and this included co creation activity with an LD Self Advocacy Group and the facilitation of focus groups at adult day centres on Wirral.

In addition, the CCG has sought to improve its communication channels and is developing a new website. Prior to the launch of the new website, the CCG introduced the Browsealoud application which provides comprehensive accessibility.

In summary, the CCG has made significant progress in meeting its statutory duties and this will progress further in the future.

NHS Wirral CCG's engagement strategy has evolved over the last year, from the development of new strategies and services to undertaking formal consultations about proposed changes. This has involved having to make some difficult decisions with regards to service provision and the CCG consulted with Wirral residents, healthcare professionals and local community groups to help make these decisions. The CCG has further developed communication and engagement methods by significantly increasing the use of social media and this has positively improved engagement and participation.

The use of online methods to engage and consult is increasingly important, and the CCG has ensured that the new CCG website is fully accessible to people with hearing or visual impairments and to those whose first language isn't English. The CCG has also developed its capability in producing 'easy read' versions of our important publications such as consultation proposals.

Going forward NHS Wirral CCG will continue to develop engagement activity which will not only ensure that the CCG meets its statutory duties to involve, consult and engage but also to progress a conversation with local community and stakeholders aligned to the three aims of the NHS Five Year Forward View (FYFV) which are Better Health, Better Care and Better Value.

NHS Wirral CCG commits to having open, honest and transparent communications and engagement activity so people understand how services will develop and change and have the opportunity to share their views.

### Workforce

The CCG has a small workforce and as such is not required under the Specific Equality Duty to publish its workforce data, however, we do review data on a quarterly basis through the Quality & Performance committee and monitor the make up of our workforce. We have been holding a Staff Engagement Group monthly for the last three years, which includes representatives from each team within the CCG. We discuss any issues staff may have as well as developing and supporting new initiatives to improve staff engagement and wellbeing. Several initiatives have been developed to support our staff to fulfil their potential.

### Initiatives from Staff Engagement Group



- CCG Charity-Staff agreed they would like to support and fundraise for a local charity on Wirral, the chosen charity for 2017/18 was Charles Thompson Mission in Birkenhead. Throughout the year staff have undertaken several fundraising activities for the charity.
- Step Challenges-Staff have taken part in several step challenges with support from Merseyside Sports Partnership, these challenges encouraged healthy competition and promoted health and wellbeing.
- Yoga: Weekly Yoga class takes place in Old Market House open to any member of staff in the building. Staff pay a heavily subsidised fee as the instructor is sourced by Merseyside Sports Partnership.

### Equality and Diversity Training

Staff working within the CCGs undertakes annual equality and diversity training. The training is designed as an introduction to diversity and cultural awareness, and as a practical guide to making organisational inclusive and anti-discriminatory. Staff training uptake is monitored by Electronic Staff Records. Equality and Diversity Training is mandatory for all CCG employees every three years and any concerns or questions can be raised in one to one supervision or annual appraisals. Over the past year 81% of our staff completed the equality and diversity training. The target for the CCG is 90% and we have developed actions for improvement.

### Organisational Development

Programme/Commissioning leads within the CCG who are responsible for transforming health services receive one to one coaching on undertaking Equality Impact and Risk Assessments. Training and information sessions on Risk Management, Privacy Impact Assessments, Equality Impact Assessments, and Quality Impact Assessments have been planned to be carried out throughout 2018.

### Challenges

Wirral is characterised by pockets of deprivation, with some of the most affluent areas nationally to some of the most disadvantaged. Lifestyle behaviours such as smoking, alcohol abuse and obesity contribute to health inequalities which are more prevalent in Wirral's deprived areas. The impact of these inequalities is evident with an average 10-year difference in life expectancy between Rock Ferry and Heswall. It is predicted that the biggest burdens of ill health for the people of Wirral will be:

- Respiratory disease
- Alcohol and alcohol related diseases
- Cancer

- Diabetes
- Heart disease and Stroke

### Targeting Inequalities

NHS Wirral CCG is acting to reduce the significant inequalities in the borough and aspires to eliminate them entirely in the future. Achievement of this ambitious aim will need a partnership approach due to the complex nature of the issues. Several strategies are already in place, examples of which include:

- Joint Strategic Needs Assessment (JSNA) used to inform service development and joint commissioning
- Health and Wellbeing Board Strategy in place and being implemented across the Wirral health and social care system
- Enhanced services in Primary Care aimed at the early identification and treatment of disease
- Collaborative working with Wirral Council (Public Health and the Department of Adult Social Services) in several areas relating to reducing health inequalities, including the on-going development of the Better Care Fund and regular strategic joint commissioning meetings
- Impact assessment of all CCG commissioning to ensure equitable service provision to prevent further widening of the inequality gap
- The adoption by Wirral CCG of a 'Vision' which states "People will have the opportunity to live longer healthy lives regardless of where they live in Wirral"
- The further development of a 'Healthy Wirral' plan which is built on the 3 principles of Better Health, Better Care and Better Value

### Workforce Race Equality Standard (WRES)

The Workforce Race Equality Standard (WRES) was launched just under three years ago to help NHS organisations focus on fundamental improvements to the experiences and opportunities for black and minority ethnic (BME) staff.

It was launched to help increase organisational efficiency and productivity and, most importantly, to contribute towards improvement in the quality of care for all patients. The WRES report sets out the CCG performance information profile and Board composition, by ethnicity, The CCG submits its WRES return to NHSE annually, as required.

### Workforce Disability Equality Standard (WDES)

The Workforce Disability Equality Standard (WDES) is a set of specific measures (metrics) that will enable NHS organisations to compare the experiences of disabled and non-disabled staff. This information will then be used by the relevant organisations to develop a local action plan and enable them to demonstrate progress against the indicators of disability equality. The WDES is important, because research shows that a motivated, included and valued workforce helps to deliver high quality patient care, increased patient satisfaction and improved patient safety.

## Showing 'Due Regard' to the Public-Sector Equality Duty

### What is 'due regard'?

Due regard means that the CCG has considered issues of equality, diversity and discrimination prior to agreeing any commissioning decisions or policies which may affect or impact on people who share protected characteristics. As a responsible public-sector organisation, the CCG considers equality and diversity integral to the development of an effective local health economy.

The CCG has considered the PSED by undertaking equality and risk impact assessments on projects, service redesign programmes and in commissioning decisions. Equality and Risk Impact Assessments to ensure that health care services are accessible and address health inequalities and the priorities for Wirral.

To be able to deliver high quality inclusive health services, the CCG aims to ensure that the needs of different groups of people are considered. A way of achieving this is through Equality Impact and Risk Assessments; to support the transformational and QIPP (Quality, Innovation, Productivity and Prevention) programme, The CCG has adopted an Equality Impact and Risk Assessment (EIRA) process. This enables the CCG to show 'due regard' to the Public-Sector Equality Duty by ensuring that all requirements around equality, human rights and privacy are given advanced consideration prior to any decisions that the CCG's Governing Body or Senior Managers make that may be affected by these issues. Our EIRA process is now firmly embedded within our commissioning and decision-making procedures.

### Equality Impact and Risk Assessment Undertaken in 2017/18

Title
<p><b>Procedures of Limited Clinical Priority</b></p> <ul style="list-style-type: none"> <li>• Stoma services policy</li> <li>• Musculoskeletal triage service</li> </ul>
<p><b>Service/pathway changes</b></p> <ul style="list-style-type: none"> <li>• Wirral Primary Care local GP access hubs service</li> <li>• End of life care</li> <li>• Cataracts referral service</li> <li>• Community phlebotomy service</li> <li>• Urgent care review</li> <li>• Cancer strategy</li> </ul>
<p><b>Medicines Management</b></p>

- Gluten Free
- Care home medication review
- Generic Prescribing policy

## Commissioning for Equality and Inclusion

As part of the contractual process All NHS Providers undertake the annual equality performance review using the NHS Equality Delivery System (EDS). Non-achievement against the schedule results in the issuing of a contract performance notice. All our key NHS providers have undertaken the EDS2 assessment and have set equality objectives in accordance with their requirements.

We are working closely with our providers to improve equality performance and access and outcomes for protected groups through robust contract monitoring, via the quality contract schedule.

All our commissioned NHS Providers have to undertake a number of actions which are part of the monitored Quality contract schedule. This includes: Equality Diversity and Human rights governance structure, engagement with stakeholder groups, staff surveys, Workforce Race Equality Scheme report, EDS2, Equality Impact Analysis on any changes which are being undertaken, annual report, data collection and human rights analysis. With smaller providers the plan is to identify and spot check a percentage of these organisations each year and implement SMART action plan.

Wirral CCG commissions services from the following providers	Equality Objectives	Published Equality Information in 2017/18	Undertaken EDS grading in 2017/18	Published WRES report in 2017/18
Cheshire & Wirral Partnership NHS Foundation Trust				
Wirral University Teaching Hospital NHS Foundation Trust				

Wirral Community Trust				
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## Assessing and monitoring the NHS Equality Delivery System (EDS2)

The EDS2 process generates evidence of the CCG's compliance with the PSED and this evidence is then reviewed by local people and stakeholders against the goals. EDS2 provides the local stakeholder group representatives and the CCG Governing Body with an assurance mechanism for compliance with the Equality Act 2010 and links our equality objectives with users of services, to ensure improvements in patient experience. The four EDS2 goals are:

1. Better health outcomes for all
2. Improved patient access and experience
3. Empowered, engaged and included staff
4. Inclusive leadership at all levels

The CCG's EDS grading assessment for 2017/18 will focus on the following goals.

EDS Goals	
Outcomes	
Goal 3	Outcome
<b>A representative and supported workforce</b>	<b>3.1</b> Fair NHS recruitment and selection processes lead to a more representative workforce at all levels
	<b>3.2</b> 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
	<b>3.3</b> Training and development opportunities are taken up and positively evaluated by all staff
	<b>3.4</b> When at work, staff are free from abuse, harassment, bullying and violence from any source
	<b>3.5</b> Flexible working options are available to all staff consistent with the needs of the service and the way people lead their lives
	<b>3.6</b> Staff report positive experiences of their membership of the workforce
<b>Goal 4</b>	
<b>Inclusive leadership</b>	<b>4.1</b> Boards and senior leaders routinely demonstrate their commitment to promoting equality within and beyond their organisations
	<b>4.2</b> Papers that come before the Board and other major Committees identify equality-related impacts including risks, and say how these risks are managed
	<b>4.3</b> Middle managers and other line managers support their staff to work in culturally competent ways within a work environment free from discrimination

Goal 3 focuses on the workforce of the CCG, Goal 4 on the leadership of the equality and inclusion agenda from the CCG Board and senior leaders. Because these Goals are focused on internal structures the grading will be carried out by CCG staff and Peer reviewed by colleagues from MLCSU.

The CCG understands that at some times in our lives we may face barriers in relation to accessing health services or experience different outcomes. The CCG wants to reduce the health differences across our diverse communities and our Equality Objectives will support us to do this.

Our Equality Objectives are to:

- Make fair and transparent commissioning decisions
- Improve access and outcomes for patients and communities who experience disadvantage
- Improve the equality performance of our providers through robust procurement and monitoring practice
- Empower and engage our workforce

## Conclusion

The report demonstrates equality developments and achievements that have been made during 2017/18. These achievements have supported the CCG in meeting their obligations under the Equality Act 2010 and PSED, in addition to working towards reducing health inequalities and improving health outcomes, access, and care for diverse patients. The CCG is committed to ensuring equality and human rights remain integral to the vision and values of the organisation and will continuously demonstrate its progress against this agenda through the annual publication of the Annual Equality and Inclusion Report.

### Contact Us

If you would like this information in another format (i.e. braille, audio, large print or a different language) please contact us using one of the methods below:

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This strategy can be found on our website [www.wirralccg.nhs.uk](http://www.wirralccg.nhs.uk)