

EQUALITY, DIVERSITY AND HUMAN RIGHTS STRATEGY 2017-2021

Placing fairness and inclusion at the heart of everything we do.

Version	Date	Comments
1	6.08.2017	EDHR steering group
1	4.9.2017	Mike Robinson

Contents:	Page
1. Introduction	3
2. Aim	3
3. Legal context	3
4. Our Equality Objectives	6
5. How we will measure our progress	7
6. Accountability and Leadership	10
7. Monitoring and Reporting	10



1. Introduction

NHS Bolton Clinical Commissioning Group (Bolton CCG) recognises the diversity of the population of Bolton and is committed to ensuring that healthcare services pay due regard to the needs of all patients, their carers and our staff.

Equality and diversity is really important to us. We ensure that our community, employees, members, partners and providers, are treated equally. In doing this we:

- Encourage diversity and eliminate unfair treatment and discrimination through a full range of policies and procedures
- Recognise that employees have rights to work in a supportive, safe and harassment-free environment and have individual and collective responsibility to value and respect each other's contributions
- Proactively encourage engagement in our decision making.

We want to ensure that equality, diversity and human rights (EDHR) are woven into the way we plan and buy healthcare services and the way our providers deliver these, and how we treat our staff. We are keen to keep in touch with local people, to improve health and well-being in Bolton, to commission quality health services and to constantly develop a well trained and highly motivated workforce.

This strategy and associated plans and actions will firmly place equality, diversity, inclusion and human rights at the centre of our work, ensuring health service users, their carers, and our staff will receive equal and fair treatment. It will help to empower patients from all groups to have greater control over the services they receive and have better health outcomes, and will help reduce health inequalities.

2. Aim

Through its work as a commissioner of services, strategic partner within Bolton and employer, and supported by this strategy, we aim to:

- Eliminate unlawful discrimination in all our functions as an employer and commissioner;
- Reduce inequalities in health amongst different groups of people living within the borough;
- Making the services we commission, singly and jointly, more accessible, consulting local people to make sure that all the communities we serve are satisfied with the standard of services provided;
- Become a strong community leader, championing equality in all aspects of our work with other local partner agencies

3. Legal context

The CCG believes in inclusivity regardless of any legal duty. However, there is a legal framework to follow and our compliance with this framework is one of the ways in which local people can hold us to account.



3.1 Summary of our legal responsibilities

Equality Act 2010 (Public Sector Equality Duty)	Human Rights Act 1998	Health and Social Care Act 2012	Other Duties
<p>General Duty</p> <ul style="list-style-type: none"> eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity foster good relations <p>Specific Duty</p> <ul style="list-style-type: none"> Publish Annual Equality information Publish equality objectives 	<p>Section 6 of the HRA makes it unlawful for a public authority (the CCG) to act in a way that is incompatible with a person's rights</p> <p>The FREDA principles Fairness Respect Equality, Dignity, Autonomy</p>	<p>CCGs must have regards to</p> <ul style="list-style-type: none"> Reduce inequalities between patients with respect to their ability to access health services Reduce inequalities between patients with respect to the outcomes achieved for them by the provision of health services 	<p>Equality Delivery System (EDS2)</p> <p>Workforce Race Equality Standard (WRES)</p> <p>Accessible Information Standard</p> <p>Projected future workforce standards</p> <p>NHS Constitution</p>

3.2 Public Sector Equality Duty

The Equality Act includes specific requirements for public bodies, known as the public sector Equality Duty. Public bodies must consider all individuals when carrying out their day to day work – in shaping policy, in delivering services and in relation to their own employees.

It also encourages public bodies to understand how different people will be affected by their activities. This helps to make sure that policies and services are appropriate and accessible to all and pay due regard to the different needs of different people.

The **General Equality Duty** requires public bodies to have due regard to the need to

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between people who share a protected

The Equality Act 2010

The Act affords protection from unfavourable treatment where this relates to one or more protected characteristics, which are:

- Age
- Disability
- Gender
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race – this includes ethnic or national origins, colour or nationality
- Religion or Belief – this includes lack of belief
- Sexual orientation

In Bolton we also consider the needs of other “inclusion health groups” such as carers, people living in poverty and homeless people when making decisions.



- characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic and people who do not share it.

The Specific Duties require us to publish information that demonstrates our compliance with the Equality Duty (in the form of an annual equality report) and specific, measurable equality objectives.

The published annual equality report must include:

- Equality information relating to our workforce who share protected characteristics (see 4.3.2 below)
- Equality information relating to the people who live in Bolton and use the services we commission.
- Information on how we have met our legal responsibilities

We also include information that shows what we have done above and beyond our legal duties, including plans and engagement with local protected characteristic groups.

3.3 Our Equality Objectives

We have now developed our equality objectives for 2017-2021.

The objectives focus on

- Reducing health inequalities and improving the health for all residents of Bolton
- Improving quality, access, experience and outcomes for those with the poorest health.
- Ensuring we are an inclusive employer

Our Equality Objectives are in accord with our corporate objectives.

See **section 4** below.

3.4 NHS Constitution

The NHS Constitution establishes the principles and values of the NHS in England. It sets out rights to which patients, public and staff are entitled, and pledges which the NHS is committed to achieve, together with responsibilities which the public, patients and staff owe to one another to ensure that the NHS operates fairly and effectively. As a CCG we are committed to taking account of the NHS Constitution in our decisions and actions.

Equality, diversity and human rights run through the principles of the constitution, promising a comprehensive service to all, recognising diversity and promoting equality, respecting human rights and tackling health inequalities. Staff are also provided with the right to be treated fairly, equally and free from discrimination.



3.5 The Human Rights Act 1998

This provides the legal framework to ensure that everyone has the right to not be unlawfully discriminated against and to be treated with dignity and respect.

4. Bolton CCG's Equality Objectives

Bolton CCG has a whole population approach to health care, which has at its heart the belief that every part of health and social care affects every other part; this means that health and social care commissioners and providers have a collective responsibility for planning and delivering better health outcomes for the people of Bolton. This collective responsibility extends to the equity of our services, and we still have a sole responsibility to fulfil our legal obligations and support our staff. Our Equality objectives are designed to enable both these requirements. Our Equality Objectives for the next 4 years are:-

1. Develop staff so they understand the context and the specific issues that influence equality, diversity and inclusion.

This objective will help us to:

- Encourage diversity and eliminate unfair treatment and discrimination (policies, procedures and training).
- Ensure that employees have a supportive, safe and harassment-free environment.
- Ensure that all employees will be considered solely on their merits for career development and promotion with equal opportunities for all.
- Ensure that all employees of CCG will to treat patients, carers and colleagues with dignity and respect.

2. Proactively seek the engagement of local vulnerable groups in our decision making

This objective will help us to:

- Engage with local vulnerable groups to identify barriers to accessing services and to ensure their voices are heard in commissioning decisions.
- Ensure meaningful equality information is collected, collated and analysed and used in commissioning decisions.
- Engage with CCG staff from protected characteristic groups to capture their experience of health care and employment.

3. Ensure that all our communities have fair access to the services we commission

This objective will help us to:

- Commission and ensure delivery of services that respond to the diverse needs of individuals and their families.
- React to identified need eg inequalities in men's health
- Ensure that all of our facilities, patient information and the environments in which our services are provided are accessible to all.
- Reduce health inequalities.



- Ensure that businesses from diverse communities have an equal opportunity of competing for collaborative procurement contracts to supply goods and services to the CCG.

4. Work with integrated health and social care across Greater Manchester to help ensure services are commissioned and delivered equitably

This objective will help us to:

- Involve staff, community groups and partner organisations to help us develop, apply and monitor our equality goals, and build our communities' trust in us;
- Include partner organisations such as Public Health in our Equality Steering Group
- Promote equality of opportunity and inclusion so that our staff and patients can achieve their potential and have the best life chances possible;
- Deliver integrated care fairly across health and social care.

The objectives will ensure that we continue to listen to vulnerable and protected characteristic groups. We will be widening the pool of groups we listen to and we will be able to understand where inequalities or differences in patient experiences occur; we will feed the information into our decisions so we can commission the right services to improve the health outcomes of vulnerable groups.

We will publish a plan to showing how we will meet these objectives on our website, and it will be reviewed annually to show the progress we are making

5. How we will measure our progress

Equality will be embedded into our strategies and plans, policies and procedures, systems and processes in the following ways:-

Governance process	Outcome	CCG Assurance
EDHR Action Plan	We can evidence how we are meeting our Equality Objectives and our EDS2 objectives through regular reviews of our Action Plan.	Exec
Equality risk management	Risks are identified by the EDHR steering group and manage via the corporate risk register as necessary	Exec
EDHR training for CCG staff, Board and support staff	Informed, aware staff and Board understand their own EDHR responsibilities, make accountable and transparent EDHR decisions with robust assurances to CCG and possess the requisite skills and knowledge to mainstream EDHR into their work and everything the CCG does.	EDHR steering group
Equality Delivery System 2	We will gather evidence to show our progress against our equality objectives and to show how	EDHR steering



	<p>inclusive our services are. This evidence will be evaluated by local protected characteristic groups at a public grading by members of local communities. The results of the grading will be published onto our website.</p> <p>We will use the EDS2 Goals and Outcomes to help us celebrate our achievements for inclusion with local vulnerable groups, and to focus on specific service challenges, leading to service improvements.</p> <p>Bolton CCG senior leadership team will embed EDS2 into its ways of working.</p>	group
Disaggregated complaints, PALS and patient experience surveys	The Governing Body receives regular disaggregated internal and provider reports on its own activities and the services it commissions to understand and address the differential experiences of different protected characteristic groups.	
EDHR Schedule in contracts	We drive achievement of our EDHR objectives through commissioning contracts. We have a duty to ensure that all local healthcare providers are meeting their statutory duties. We monitor performance, patient experience and service access and work with service providers to analyse their progress on equality objectives. We will scrutinise evidence and check provider websites for legal compliance with the PSED.	EDHR steering group
Contract monitoring	Contracts with our providers include a requirement on services to monitor equality to ensure equal access to, and satisfaction with, the services we commission.	EDHR steering group
Equality and human rights embedded into employment practices	Internally we will ensure a culture, policies and procedures that not only protect a diverse workforce but also value the richness that diversity brings amongst our patients and staff. We will engage with our staff and staff-side colleagues and ensure our governing body and staff are equality and diversity competent. Through a regular staff survey we will review our progress and map actions to continuously improve.	Board
Bolton JSNA	Services are commissioned with due regard to the needs of each of the 9 local protected groups based on inequalities identified in the JSNA. These health needs assessments form a key part of the evidence base on which our commissioning decisions are made.	Board



Discrimination and hate crime reporting	CCG and provider partners can recognise and report any potential discrimination or Hate Crime incidents plus support alleged victims..	Board
Strategic decisions based on information in Board Papers	Equality Analysis takes place during the commissioning process and assures Board that due regard has been paid to the needs of protected groups Strategic Plans and prioritisation decisions are always assessed for potential impacts on people from protected groups to ensure that decisions are fair	Board
Bi-monthly report on EDHR outcomes achieved	Accountable evidence of progress as a “you said, we did” approach to inclusion for marginalised or vulnerable communities	EDHR steering group
Public and Patient Communication and Engagement	Patient Engagement Leads work closely with Commissioners to achieve evidence of improved outcomes for vulnerable people into commissioning service specifications. We have a Communication and Engagement Strategy for patient and public engagement which takes account of the needs of our diverse communities. We have developed structures to engage with our diverse communities, and we use methods and engagement tools tailored to target audiences. We actively engage with patients from local equality and diversity groups, giving them a voice to raise any adverse impacts for protected groups that arise from key changes to service delivery. We achieve this through our equality target action group (ETAG) network and via community networks	EDHR steering group
Equality Analysis	All decisions are evaluated to assess their impact on vulnerable groups. Protected groups have a voice to help shape commissioned services from earliest stages via the ETAG and other engagement. Equality Analysis will be scrutinised.	EDHR steering group

6. Accountability and Leadership

6.1 The Governing Body will monitor progress on our Public Sector Equality Duties through regular reports and exception monitoring and by ensuring that the CCG publishes annual reports that demonstrate both compliance with the Public Sector Equality Duty and progress on the equality objectives laid out in this document. Members of the Governing Body will be supported in this role through leadership training. The CCG’s Chief Officer will be ultimately responsible for this Equality Strategy.



6.2 The Equality, Diversity and Human Rights steering group will oversee the CCGs equality, diversity and inclusion work. This steering group will be responsible to the Governing Body for ensuring that equality, diversity and human rights are incorporated into all aspects of our work. It will ensure that The CCG works collaboratively with other commissioners and service providers, across Bolton, Greater Manchester and wider, to ensure a cohesive and holistic approach to EDHR.

7. Monitoring and Reporting

The EDHR Steering Group will meet at least 6 times per year, and will

- Plan, oversee and monitor CCG actions to ensure compliance with the public sector Equality Duty
- Link with GMMH, Bolton FT, Bolton Council and other stakeholders where possible
- Plan, oversee and monitor CCG actions to ensure improvements in EDHR performance through implementation of EDS
- Influence providers and hold them to account
- Receive and review updates from provider organisations.
- Monitor Performance against CCG equality targets and progress against the EDS outcomes
- Report formally on a quarterly basis to the CCG Board.

We will review this Equality Strategy every 2 years. However, if any new legislation or best practice measures are introduced that directly impact on this Strategy, these may be incorporated earlier than the two year cycle. The next review will be in June 2019.

