

**Clinical Commissioning Group Governing Body**  
**Paper Summary Sheet**  
**Date of Meeting: 22 July 2014**

For: PUBLIC session  PRIVATE Session

For: Decision  Discussion  Noting

<b>Agenda Item and title:</b>	<b>GOV/14/07/23 Equality Information – Compliance Report 2014</b>
<b>Author:</b>	Bianca McClounan, Patient Safety Support Manager
<b>Lead Director/GP from CCG:</b>	David Noyes, Director of Planning, Performance & Corporate Services
<b>Executive summary:</b>	<p>The Public Sector Equality Duty (PSED) is a specific duty placed on public authorities and requires us to publish equality information to demonstrate our compliance with the legislation set out in the Equality Act 2010. An equality compliance report was published by the CCG at the end of January 2014 as required. This report is available on the CCG website.</p> <p>The CCG has arranged a Service Level Agreement specification with the CSU to provide specialist assistance for this area as the CCG takes forward its performance assessment for Equality &amp; Diversity using the 'Equality Delivery System for the NHS (EDS2)'.</p> <p>The CCG is in the process of arranging specialist training for staff which is expected to occur in the Autumn.</p>
<b>Evidence in support of arguments:</b>	Equality Impact Assessments are undertaken and presented with papers to the Governing Body to inform discussion and approval. CCG staff undertake mandatory equality and diversity training.
<b>Who has been involved/contributed:</b>	The CCG has mechanisms in place to involve Healthwatch in public involvement activities.
<b>Cross Reference to Strategic Objectives:</b>	The equality arrangements contribute to the governance of the CCG supporting and underpinning all Strategic Objectives.
<b>Engagement and Involvement:</b>	The use of the EDS2 will assess CCG engagement.

<b>Communications Issues:</b>	This document has been published on the CCG website since January 2014 and is available for release under the FOI Act.
<b>Financial Implications:</b>	None.
<b>Review arrangements:</b>	Performance against the Public Sector Equality Duty will be reported to a Governing Body meeting later this year.
<b>Risk Management:</b>	The equality arrangements contribute to CCG risk management.
<b>National Policy/ Legislation:</b>	The Public Sector Equality Duty (PSED) is a specific duty placed on public authorities and requires us to publish equality information to demonstrate our compliance with the legislation set out in the Equality Act 2010.
<b>Equality &amp; Diversity:</b>	An EIA has not been undertaken as this document reports on the equality compliance within the CCG at January 2014.
<b>Other External Assessment:</b>	None
<b>What specific action re. the paper do you wish the Governing Body to take at the meeting?</b>	The Governing Body is asked to note the contents of the report and the continuing progress against this agenda.

Equality Information –  
Compliance Report 2014  
DRAFT

We will consider requests for alternative accessible formats of this document. Please contact us by any of the following:

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If you have any comments, suggestions or feedback about this document, please contact the Communication and Engagement Department.

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**DRAFT REPORT**

This report is draft until it is reviewed  
by the CCG Governing Body in April  
2014

## 1. Introduction

### 1.1 About NHS Wiltshire Clinical Commissioning Group

NHS Wiltshire Clinical Commissioning Group (CCG) is a commissioning organisation, that is to say, we plan and buy health services for Wiltshire residents. We do not provide health services ourselves. For more information on what health services we commission, please visit our [website](#).

The CCG came into existence on the 1<sup>st</sup> April 2013.

### 1.2 Public Sector Equality Duty and the purpose of this document

The Public Sector Equality Duty (PSED) is a specific duty placed on public authorities and requires us to publish equality information to demonstrate our compliance with the legislation set out in the Equality Act 2010.

In this document we set out what we are currently doing to comply with the general duty.

The document is structured in four sections<sup>1</sup>:

- i. Equality information on our workforce and leadership;
- ii. Equality information on our services;
- iii. Equality information on our ways of working;
- iv. Equality information to show due regard to the three aims of the general duty.

## 2. Profile of equality groups in Wiltshire

The population of Wiltshire based on NHS Wiltshire Prospectus 2013-14 is approximately 477,000. The population of Wiltshire accounts for 8.90% of the total South West population.

The following are headline figures for different sections of the community in Wiltshire:

- Children (aged between 0-15) make up 18.0% of the population, people of pensionable age (65+) make up 20.2% of the population and the largest age group is people of working age (16-64) who make up 63.4% of the population.
- There is a near equal split between males and females.

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<sup>1</sup> Based on the format used by the Equality and Human Rights Commission

- The Black and Minority Ethnic (BME) population make up 4.7% of the Wiltshire population
- Within the BME groups of Wiltshire population, the Moroccan community is considered to be the largest outside London. The Safe and Sound report identified 106 self-declared ethnicities in Wiltshire. There are also significant African-Caribbean, Polish, Slovakian, Chinese, Bangladeshi, Pilipino, Gypsy and traveller, Indian and Pakistani communities in Wiltshire and a significant gypsy and traveller community.
- The majority of Wiltshire's residents reported that they were Christian (64%) or had no religion (26%). The largest religions other than Christianity are Muslim (0.4%) and Buddhism (0.3%) with Hindu, Jewish and Sikh groups making up 0.4% of the population. (Wiltshire Census 2011)
- The government establish that 5-7% of the population is lesbian, gay or bisexual, so Wiltshire may have approximately 23,850 people who are lesbian, gay or bisexual.
- The Gender Identity Research and Education Society, GIRES, estimate (in 2011) that 0.6%-1% of the population (16+) experience some degree of gender variance, which in Wiltshire (based on 16+ population of 400,680) would equate to approximately 2,404 - 4,007 people. The majority of these would continue to live in their birth gender and not request medical intervention, and GIRES estimates that, at some stage, about 0.2% may undergo treatment for gender transition – an estimate of up to 801 people in Wiltshire.
- 97.5% of residents' main language is English, and 99.6% of the resident population of Wiltshire can speak English well. Polish is the main language spoken after English. This was followed by Nepalese, German, Tagalog (Filipino) and Chinese.
- 10% of the population are carers.

### **3. Equality Information on our Workforce and Leadership**

#### **3.1 Workforce**

Information is collected on annual basis on the CCGs workforce, where possible against the protected characteristics. As of 1<sup>st</sup> January 2014, there were 116 people, 102.05 whole time equivalent members of staff employed at the CCG.

As the numbers are so small, it is relatively easy to identify staff and as a consequence this gives rise to potential breaches of confidentiality. The PSED exempts those organisations with fewer than 150 staff from publishing information relating to the protected characteristics of their employees.

The CCG has in place, and is in the process of developing, a number of workforce related policies that support and protect staff from discrimination, harassment, bullying and victimisation.

### **3.2 Leadership**

The CCG [governing body](#) is made up of GPs, lay members, clinical and health professionals from the workforce. As there are just 13 board members, the CCG are again exempt from publishing equalities information relating to their protected characteristics.

However, it is important to note that the core attributes and competencies for all Board members include a requirement to 'be committed to ensuring that the organisation values diversity and promotes equality and inclusivity on all aspects of its business'.

Individual members of the governing body will bring different perspectives, drawn from their different professions, roles, backgrounds and experience. These differing insights into the range of challenges and opportunities facing the CCG will, together, ensure that the CCG takes a balanced view across the whole of its business.

The CCG has a lay member on the governing body with specific responsibility for Patient and Public Involvement.

## **4. Equality Information on our Services**

The CCG does not provide health services, but plans and buys (commissions) health services for the population of Wiltshire.

## **5. Equality information on our ways of working**

The Director of Planning, Performance and Corporate Services provides strategic leadership on equalities and assurance to the CCG Board on whether we are meeting our statutory obligations.

The CCG has an Equality and Diversity Strategy which is available on our website. A yearly action plan accompanies the CCG's Strategy.

The Equality and Diversity Strategy has identified the following equality objectives for the CCG over the period, April 2013 to March 2017:

- i. Improve the quality of information available about the prevalence of health conditions in different communities with specific protected characteristics.
- ii. Embed equality and diversity considerations into communications, engagement and consultation.
- iii. To actively identify key services issues for service users to support specific actions to be implemented based on evidence to improve service user outcomes.
- iv. To focus on developing the CCG leadership and capacity to ensure that the CCG continue to comply with the PSED and use EDS to improve equality performance and ongoing compliance with the PSED.

The CCG requires all staff to undertake mandatory Equality and Diversity training. Training is provided by an online module which staff have to pass. There is not an explicit requirement in the Equality Act 2010 about type or level of training.

Recently, the CCG has undertaken public engagement to inform the review of the Wiltshire Rheumatology services strategy. Patients, including a number of disabled individuals, have advised the CCG as to the good points of the existing services, what is not so good and where there are any barriers. The CCG will now work on a new strategy for Rheumatology Services which will then be shared with the public.

The CCG conducts Equality Impact Assessments (EIAs) on all policies, Governing Body papers and when formulating proposals for changes to services to ensure that these do not discriminate against protected groups and to identify opportunities to promote equality. The EIA forms will be approved by the Executive Sponsor for the work. Examples of Equality Impact Assessments are available on our website and are attached to the relevant [Board papers](#). The CCG is developing its website and individual examples of EIAs will be available separately on our revised site.

We regularly undertake Consultation and Engagement with Patients and the Public. The CCG has a Communication and Engagement Strategy 2013-16: for sustainable and meaningful stakeholder engagement. An engagement plan is currently being prepared for the CCG 5 Year Plan.

We require providers to meet equality and diversity legislative requirements as part of the procurement process for new or revised commissioning contracts.

The CCG is committed to providing the best possible service at all times. They welcome suggestions and feedback about our services and want to resolve any problems experienced to help make local healthcare services more effective. Although the CCG oversees all comments, concerns, compliments and complaints that are received, the CCG has delegated management of the process to the Central Southern Commissioning Support Unit (CSCSU).

The CCG commission a Patient Advice and Liaison Services (PALS) from the Central Southern Commission Support Unit (CSCSU). PALS is impartial and will work to try and resolve any concerns or problems. Complaints can be made in writing, by e-mail, by telephone or in person.

PALS provide regular reports to the CCG and a PALS report is also presented to the Quality and Clinical Governance Committee. This report will be developed to include the protected characteristics of the individual where disclosed.

The CCG has a regular programme of 'Integrated Quality and Performance' reviews with providers. During these meetings, the following issues are raised and where needed, the provider is required to implement an action plan which is then monitored. Issues discussed include:

- Incidents where patient safety was compromised, including incidents of abuse, harassment, bullying and violence, across the protected characteristics.
- Survey information showing patients' experience of treatment and care outcomes, for all major services or departments. The most notable of this is the [Friends and Family Test](#).
- Information from PALS, indicating the issues that patients most complained about, with follow-up information on redress

We are currently working with other NHS colleagues and the local Healthwatch Wiltshire to develop and support a group of representatives from across the equalities communities to help us in our work to improve healthcare services.

Our premises are accessible and we ensure that all our public meetings are held in accessible premises.

## 6. Equality Information to show due regard to the three aims of the General Duty

### 6.1 Workforce

We have system and procedures in place to implement the aims of the general equality duty:

- Elimination of discrimination, victimisation and harassment:

The Quality and Clinical Governance Committee has delegated powers to approve policies and have been appraised of their role in relation to the requirements of the Equality Act and PSED ensuring the CCG meet the relevant duties.

- Advancing equality of opportunity and fostering good relations:

We are a comparatively small public sector organisation, and do not have the critical mass to sustain our own staff networks. We are looking at mechanisms for involving our staff including the Bristol, North Somerset and South Gloucestershire wide Black and ethnic Minority, Disability and Lesbian, Gay and Bisexual and Transgender staff networks.

### 6.2 Patient and Public

- Elimination of discrimination, victimisation and harassment:  
As mentioned earlier, we use EIAs to ensure that the CCG is meeting general duty and we require providers to comply with equalities legislation.

- Advancing equality of opportunity and fostering good relations:

The CCG will be using the [NHS Equality Delivery System](#) to assess performance. The aim is to achieve at least a developing/amber grade, if not an achieving/green grade. We will report on our performance after our first years' work in the summer of 2014.

#### **Prepared by:**

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