**Appendix 2**

**Southport & Formby and South Sefton CCGs Workforce Equality and Diversity Plan 2021/22 –** updated September 2021

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| **Task** | **Associated Actions** | **Outcomes** | **Owner(s)** | **Completion Date** | **EDS****Comparators** |
| Annual completion of NHS Workforce Race Equality Standard (WRES) | 1. Implement and embed the 9 national Workforce Race Equality Standard indicators as per NHS England guidance. Continue commissioning the NHS Staff Survey including equality specific indicators.
2. CCG to be represented on the Regional Black, Asian and Minority Ethnic Strategic Advisory Group.
3. CCG to have Board Level Health Inequalities Lead (in line with the NHS People Plan).
4. CCG to review internal Equality and Diversity training offer with a view to incorporating Unconscious Bias training and/ or Reverse Mentoring Programme in addition to HR’s ongoing review of content of mandatory Equality and Diversity Training.
5. CCG to develop internal processes to record non-mandatory training.
6. CCG to liaise with HR colleagues to benchmark the CCG’s Disciplinary Policy against Imperial College Trust’s policy (as recommended to all NHS Trusts by Amanda Pritchard, Chief Operating Officer for NHS England and Improvement).
 | Eliminate DiscriminationAdvance equality of opportunity  | Interim Programme Lead- Corporate Services, Human Resources Business Partner and Merseyside CCGs Equality and Inclusion Service Lead | **October 2021**Update September 2021Workforce Race Equality data submitted to the national team before 31st August 2021 deadline. Summary report enclosed. The summary report is due to be published on the external website by the end of October 2021. **October 2020**Update February 2021Complete A Liverpool GP colleague is Liverpool CCG’s representative on the Regional Advisory Group. The GP feeds into the North Mersey CCGs informal BAME Peer Support Group of which South Sefton CCG and Southport and Formby CCGs are invited to attend. The CCG’s Chief Officer has also been invited to attend an online engagement event with the BAME assembly in September 2021.**October 2020**Update September 2021 Complete.The CCG’s Chief Nurse confirmed as health inequalities lead. **January 2022** Update September 2021 Due by date amended as cultural competency training for all CCG staff was planned for July 2021. Due to ongoing working from home arrangements as a result of the COVID-19 pandemic this has paused due to face to face being the preferred delivery method for this type of training, **November 2020**Update September 2021completeFunction to record non-mandatory training activated in ESR and a formal communication issued to all staff via the staff bulletin to promote self-recording.**March 2021**Update September 2021completeDisciplinary policy benchmarked against Imperial College Trust’s policy. The amended version progressed through theCCG’s internal governance process and is now ratified.  | 3.13.23.33.43.64.14.24.3 |
| Development of a system wide approach to Positive Action initiatives allowed under the Equality Act 2010.  | 1. Monitor performance of Human Resource policies against the Public Sector Equality Duty to establish baseline.
2. Identify trends from CCG data.
3. CCG and Merseyside CCGs Equality and Inclusion Service to ensure that Human Resource services are linked into the Workforce Equality Focused Forum (WEFF) and facilitate sharing of best practice, development opportunities.
4. Review and refresh workforce communications (Bulletins, intranet) to promote inclusivity.
5. Promote access to Staff Equality Networks and review reporting mechanisms to enable staff contribution to and inform decision-making processes.
 | Challenge barriers if data/evidence identifies themAdvance equality of opportunityAims to ensure collaboration and partnership working.Ideas to promote diversity in the workplace are being considered and will be shared.. | Interim Programme Lead- Corporate Services, Human Resources Business Partner and Merseyside CCGs Equality and Inclusion Service Lead | **Ongoing**Update September 2021Process established with Impact Assessed Policies being presented to Corporate Governance Steering Group. The recommendations of that group are then presented to Finance and Resource Committee for consideration. The Corporate Governance Steering Group meetings had paused for a period during the COVID-19 pandemic however has since been reinstated. **Ongoing**Update September 2021The CCG reviewed the results of the latest NHS staff survey and internal surveys about changes to usual working practices during the COVID-19 pandemic. Survey findings and recommended actions are reviewed and overseen by the Sounding Board.No issues identified during the period in relation to the application of CCG HR policies. The CCG has for the first time reviewed staff disability data. Further narrative provided in WDES section. **September 2020**Update February 2021CompleteHR business partner invited to attend WEFF meetings.**Ongoing**Update September 2021Dedicated page on the CCG intranet launched to promote staff networks. The CCG communications team continues to promote webinars, events and information relating to equality and health inequalities. The CCG recently approved an inclusivity statement for use with job adverts. **Ongoing**Update September 2021Dedicated page on the CCG intranet launched to promote staff networks. Following internal engagement with staff the sounding board now receive minutes of the staff equality network meetings. This forum was determined as the most appropriate to aid informing decision making. | 3.23.53.13.33.54.14.3 |
| Support Primary Care colleagues to identify and address workforce Equality issues. | 1. Meeting to be arranged with Primary Care Commissioning Leads in the first instance with a view to developing a specific action plan.
 | Eliminate DiscriminationAdvance equality of opportunityFoster Good Relations | Interim Programme Lead- Corporate Services, Human Resources Business Partner and Merseyside CCGs Equality and Inclusion Service Lead | **December 2020**Update September 2021A meeting has not yet taken place with Primary Care leads due to those colleagues supporting the COVID-19 vaccination programme and other key areas of work to recover services. **Propose to extend the completion date to March 2022 with a view that support for primary care will ultimately need to transfer into system and place plans.** | 3.13.33.43.6 |
| Implementation of the Workforce Disability Equality Standard (WDES) as per NHS England guidance.  | 1. Prepare for the implementation of the WDES, to include familiarisation with proposed national KPIs.
 | Eliminate DiscriminationAdvance equality of opportunity | Interim Programme Lead- Corporate Services, Human Resources Business Partner and Merseyside CCGs Equality and Inclusion Service Lead | **Ongoing**Update September 2021The CCG planned to submit a voluntary submission in 2021/22 as WDES has not yet been mandated for CCGs. Due to the national team supporting the system in different ways during the pandemic the request to include the CCG on the portal for voluntary submission was not actioned in time. The CCG has however continued to progress as planned just without the formal submission. A separate paper has been developed to summarise the baseline workforce disability data and propose recommended next steps.  | 3.13.33.43.64.14.3 |

Action Plan to implement 6 inclusive recruitment actions – NHSE return 3rd September 2021:

| **#** | **Key Action** | **Steps to achieve action** | **Due by**  | **Risks** | **Mitigations** | **Status**  |
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| 1. | Ensure VSMs own the agenda, as part of culture changes in organisations, with improvements in BAME representation (and other under-represented groups) as part of objectives and appraisal by:a) Setting specific KPIs and targets linked to recruitment.b) KPIs and targets must be time limited, specific and linked to incentives or sanctions | Identify appraisal dates for VSM to ensure equality specific objectives and actions can be included at next review. Ongoing monitoring of WRES data and career progression disparity ratio. Job advert template to include standard requirements e.g. inclusivity statement once agreed.Remind hiring managers to prioritise disabled candidates meeting essential criteria for interview (2 Ticks Disability Scheme). Promote external job adverts wider than usual using existing networks – via social media and more inclusive job boards and partnering with BAME communities (to promote jobs and see if potential to hold targeted recruitment fairs for under-represented groups). | 31st October 2021 Ongoing 31st October 2021 30th September 2021 Ongoing  | Small number of VSMs in the organisation. VSMs could transition into different roles within the ICS before April 2022.  | The CCG has equality objectives and associated action plans which will continue to be monitored. The equality and inclusion service will continue to support delivery and embedding the equality agenda.  | Not startedCovered by workforce equality action plan.Complete Not startedNot started |
| 2. | Introduce a system of ‘comply or explain’ to ensure fairness during interviewsThis system includes requirements for diverse interview panels, and the presence of an equality representative who has authority to stop the selection process, if it was deemed unfair. | Explore NHSE regional equalities team training offer on recruitment bias. Consider connecting with local partner organisations who have a more diverse workforce to support interviews.  | Ongoing | CCG recruitment currently restricted due to ICS integration. Due to the size of the organisation, capacity to increase representative interview panels may not be possible.  | Recruitment bias presentation to be shared with all recruiting managers.CCG equality and inclusion leads to liaise with ICS HRD and Strategic planning lead to ensure this action forms part of system and place recruitment plans. | Not started |
| 3. | Organise talent panels to:a) Create a ‘database’ of individuals by system who are eligible for promotion and development opportunities such as Stretch and Acting Up assignments must be advertised to all staffb) Agree positive action approaches to filling roles for under-represented groupsc) Set transparent minimum criteria for candidate selection into talent pools | Communicate basic principles of internal and external recruitment and promotion processes to staff through staff bulletins and team meetings. | 31st October 2021 | Limited number of opportunities currently available.  | Recommend ICS consideration of talent panels.Positive action approaches included in the CCG’s workforce equality action plan.  | Not started |
| 4. | Enhance EDI support available to:a) Train organisations and HR policy teams on how to complete robust / effective Equality Impact Assessments of recruitment and promotion policiesb) Ensure that for Bands 8a roles and above, hiring managers include requirement for candidates to demonstrate EDI work / legacy during interviews.  | Not applicable- MLCSU Equality and Inclusive service undertaken equality analysis on HR policies. Include at least 1 additional EDI question on the interview scoring matrix, and share supporting guidance with recruiting managers to assess whether a satisfactory response.Record EDI training of interview panel on the recruitment documentation.Remind staff of key areas relating to EDI when recruiting staff and record-keeping to evidence decisions.  | 31st October 2021Ongoing31st October 2021  | EDI training status not recorded.Scoring / rationale not recorded.  | Ensure action forms part of ICS and place plans.Review internal training log to obtain status.Recruiting manager to check documentation for completeness.  | Not startedNot startedNot started |
| 5. | Overhaul interview processes to incorporate:a) Training on good practice with instructions to hiring managers to ensure fair and inclusive practices are used. b) Ensure adoption of values based shortlisting and interview approachc) Consider skills-based assessment such as using scenarios | Explore recruitment bias training for recruiting managers. | 30th November 2021  | Preferred method for delivery of this type of training is face to face – due to ongoing work from home arrangements it may not be possible to hold face to face training which may impact on the training effectiveness.  | Recruitment bias presentation to be shared with all recruiting managers.Unconscious bias training planned. | Covered by workforce equality action plan. |

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| 6. | Adopt resources, guides and tools to help leaders and individuals have productive conversations about race | Continue to share resources EDI resources with CCG staff e.g. Covid-19 briefings as a comprehensive information resource.Review and expand EDI/accessibility content on CCG website and intranet.Continue to promote the North Mersey CCGs Staff Equality Network and Black, Asian and Minority Ethnic Peer Support Group and inclusivity calendars  | Ongoing  | The CCG had planned to look at adopting the Race Equality Code 2020 however in view of the national Race Equality Strategy review this has paused.  | NHS Race Equality Strategy currently being developed.  | Covered by workforce equality action plan.Covered by workforce equality action plan.Covered by workforce equality action plan. |