

Equality Delivery System (EDS2)

Summary Report and Action Plan

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Introduction and Background

Goal 1: Better outcomes

The Equality Delivery System (EDS2) is a specific equalities reporting framework for the NHS. It has four goals and 18 outcomes. From April 2015, EDS2 became mandatory for NHS organisations including CCGs. The 2015/16 CCG Assurance Framework states:

“A CCG will need to demonstrate: robust implementation of EDS2 to help meet the Public Sector Equality Duty and improve their performance for people with characteristics protected by the Equality Act 2010; and assurance, through the provision of evidence, that their Providers are doing the same.”

In 2018 NHS Greenwich Clinical Commissioning Group (the CCG) undertook a comprehensive EDS2 self-assessment across the four goals and 18 outcomes in relation to the nine protected groups by law (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

The EDS2 provides the framework for the CCG to assess our equality performance in relation to:

- Current performance – how good we are
- How good we could be

The EDS2 comprises 18 outcomes, grouped into four goals, against which the CCG analyses its performance and uses the results to identify equality objectives and areas for improvement going forward

In Summary:


- Goal one (better health outcome), the CCG is amber (developing)
- Goal two (improved patient access and experience), the CCG is amber (developing)
- Goal three (a representative and supported workforce), the CCG is green (achieving)
- Goal four (inclusive leadership), the CCG is green (achieving)

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1.1 Services are commissioned, procured, designed and delivered to meet the health needs of local communities

Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
<p>Amber (Developing)</p> 	<p>Age Disability Race Pregnancy and Maternity Sex</p>	<ul style="list-style-type: none"> • JSNA identifies the health needs and wellbeing for the Greenwich Borough and is used to inform the CCG commissioning We develop equality impact assessments to support the delivery of our programmes, and make sure that our public engagement approach considers equalities information. • Partnership work with Royal Borough of Greenwich to implement a new social prescribing (Live Well Greenwich) programme to better meet the needs of vulnerable people with the poorest health. Part of this includes funding of care navigator roles • Frailty Service - developed a frail elderly pathway, result in the establishment of the community Assessment Unit at Eltham Hospital • Local delivery of Community Cased Care (CBC) programme Greenwich now offer extended primary care access through GP Access Hubs • Hosting of Wellbeing Coaches within GP practices. • CCG embarked on Stakeholders Mental Health Review to identify successes and where there could be improvement. • Greenwich CAMHS Transformation Plan the CCG's commitment to improving mental health services – in partnership we have funded CYP Mental Health Liaison Nurse • Better Care Fund (BCF) placing the patient at the heart of their care by providing fully integrated health and social care • Cancer networks • Maternity Steering Group • Transforming Community Care Services Strategy • Establishing of GP Patient Participation Groups (PPGs)

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		<ul style="list-style-type: none"> • Healthwatch Reports • Equality Analysis report on orthopedic care OHSEL – Quality Committee and engagement plan • Music Therapy EIA report • QIPP QIA/EIA's business cases • Data Collected Through CMB performance reports • PPI engagement event for the CCG Commissioning intentions • Friends and Family test • Equalities SUS data for A&E/UCC Inpatient Admissions, Maternity, Outpatient Admissions
<p>The CCG is currently assessing itself as amber in this area as we cannot assure ourselves that outcomes are reported for all protected characteristic groups.</p>		
<p>1.2 Individual people's health needs are assessed and met in appropriate and effective ways</p>		
Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
<p>Amber (Developing)</p> 	<p>Age Disability Race Pregnancy and Maternity Sex</p>	<ul style="list-style-type: none"> • South East London Treatment Access Policy • Individual Funding Requests (IFR) • Maternity Network • Maternity Voice Partnerships - Better Birth Implementation Plan • QIPP on CHC assessments • Oxleas engagement • LGT Engagement of protected groups • CQRG equality reports • Oxleas carers Strategy • Lead on Mental Health and Learning Disabilities. - Transforming Care Programme • Mental Health Childrens Safeguarding Reviews • IAPT Services • Annual Health Checks for adults and young people with learning disabilities • Learning Disabilities Mortality Review • BCF • Quality Accounts • JSNA • Friends and Family Test • Individual medication reviews in care homes

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		<ul style="list-style-type: none"> • Telehealth kits in care homes • Latent TB Infection Testing • CQC NHS Surveys- Adult Inpatient, Maternity, ED & Community Mental Health Services.
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The CCG is currently assessing itself as amber in this area as we cannot assure ourselves that that all needs for services are described according to relevant characteristics or are met equally across protected groups.

1.3 Transitions from one service to another, for people on care pathways, are made smoothly with everyone well-informed



Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Amber (Developing) 	Age Disability Race Sex	<ul style="list-style-type: none"> • Engagement Strategy • Engagement plan • Quality Accounts • Five Year Forward View • Friends and Family Tests • Serious Incident reports • Stroke Neuro Navigator • UCC Patient Champions • Community Mental Health Liaison Nurse • Connect Care • Transfer of Care Collaborative • Discharge to assess unit - Duncan House • Frailty Service – Community Assessment Unit • Introduction of the "Red Bags" to facilitate from hospital • MSK Service • Hospital at Home • Green Finches Falls Elimination Strategy Project

The CCG is currently assessing itself as amber in this area as we cannot assure ourselves that transitions between services are being met equally across the protected groups.

1.4 When people use NHS services their safety is prioritised and they are free from mistakes, mistreatment and abuse

Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Amber (Developing)	Age Disability	<ul style="list-style-type: none"> • CQRG's Minutes and Quality reports • Quality Alert Management System

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	Race Sex Pregnancy and maternity	(QAMS) <ul style="list-style-type: none"> • Joint safeguarding Group • Risk Registers • Serious Incidents • Commissioning Complaints • Safeguarding post • CQC reviews audits • NHS England Safeguarding Audits • Provider Assurance on staff safeguarding training compliance • Quality Assurance visits. • Integrated Performance report
<p>The CCG is currently assessing itself as amber in this area as we do not have a full data set to assure ourselves that all protected characteristic groups' safety is prioritised in the same way .</p>		
<p>1.5 Screening, vaccination and other health promotion services reach and benefit all local communities</p>		
Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
 Green (Achieving)	Age Disability Race Sex Pregnancy and maternity Marriage and civil Partnership Sexual orientation	<ul style="list-style-type: none"> • Flu Campaign uptake • Health Protection Committee RBG evidence • JSNA • Health & Social Care Information Centre • Health Promotion and Health Protection publications • Winter Pressure Campaign • C.Diff Working Group • Latent TB infection Testing • Healthier London Partnership – Joint plan to cut rates of HIV infection
<p>The CCG cannot fully assure itself because we do not have full information on whether these services reach and benefit all protected groups</p>		

Goal 2: Improved patient access and experience

2.1 People, carers and communities can readily access hospital, community health or primary care services and should not be denied access on unreasonable grounds


Grade	Protected characteristics	Evidence drawn upon for rating.
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	that fare well	
Amber (Developing) 	Age Disability Race Sex	<ul style="list-style-type: none"> • TAP • IFR • QIPP QIA/EIAs • Oxleas Carer Strategy • Engagement on Access • Developing Easy Read Materials for people with Learning Disabilities • School outreach work with families signposting to mental health support services. • NHS Patient Survey • GP patient survey • A&E waiting times • Quality Reports • Healthwatch Reports • Carers & Patients Complaints • Healthier London Partnership - GP access for the homeless • Carers Assessment

The CCG is currently assessing itself as amber in this area as we cannot assure ourselves that all protected groups have equal levels of access and experience of services

2.2 People are informed and supported to be as involved as they wish to be in decisions about their care


Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Amber (Developing) 	Age Sex Pregnancy and maternity	<ul style="list-style-type: none"> • QC Safeguarding Review • CHC Assessments • Joint Safeguarding Group • NHS Patient Surveys • GP Patient surveys • Quality reports • Oxleas Carers Strategy • MSK Service • Personal Health Budget take up -person-centred pathways for people with long-term conditions and continuing care, including children • Patient Choice

The CCG is currently assessing itself as amber in this area as we cannot assure ourselves that there is the same level of information and support for all protected characteristic groups.

2.3 People report positive experiences of the NHS


Grade	Protected	Evidence drawn upon for rating.
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	characteristics that fare well	
Amber (Developing) 	Age Sex Disability Pregnancy and maternity	<ul style="list-style-type: none"> NHS Patient Survey Friend and Family Test Patient experience data from national surveys, provider surveys and soft data through engagements, twitter, NHS Choices and patient opinion. <p>Examples include:</p> <ul style="list-style-type: none"> 81% of the patients responded as 'very good' or 'fairly good' to the question, 'overall, how would you describe your experience of your GP surgery? 81% of the patients responded as "very good' or 'fairly good' to the question, 'overall, how would you describe your experience of making a GP appointment? 8 out of 10 score rating on the level of satisfaction with their visit to our hospitals and the quality of care they received Inpatients at our local Trust gave a score of 8.6 out of 10 for having had confidence and trust in the staff treating them. And a score of 8.6 out of 10 for how clean the ward environment and bathroom facilities were

The CCG is currently assessing itself as amber in this area as we cannot assure ourselves as the is insufficient data for all protected characteristic groups.

2.4 People's complaints about services are handled respectfully and efficiently


Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Amber (Developing) 	Age Disability Sex Marriage and civil partnership	<ul style="list-style-type: none"> The CCG is responsible for managing complaints about directly commissioned services and reports on a quarterly basis internally and to NHS Digital, but provider complaints are also monitored by the CCG at the monthly CQRG meetings.

The CCG is currently assessing itself as amber in this area as we cannot assure ourselves that all protect groups are accessing the complaints services.

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Goal 3: A representative and supported workforce.

3.1 Fair NHS recruitment and selection processes lead to a more representative workforce at all levels

Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Green (Achieving) 	Age Disability Pregnancy and maternity Race Sex Sexual Orientation	<ul style="list-style-type: none"> The recruitment and selection processes conform to 'NHS Jobs', which is a dedicated national online recruitment service for the NHS The CCG small workforce is broadly representative CCG WRES & Action Plan NHS Staff Survey Local Workforce Data and Surveys Review of Recruitment and selection process CCG Organisational Development Strategy & Plan.

At this point, the CCG can be assured that staff members from most of the protected characteristics fare reasonable well in the selection process.

3.2 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' at all levels


Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Green (Achieving) 	All	<ul style="list-style-type: none"> Equal pay has been set nationally as part of Agenda for Change The CCG allocates posts to pay bands – staff are placed in one of nine pay bands on the basis of their knowledge, responsibility, skills and effort needed for the job Equal Pay Audits Gender pay Gap

The CCG is assured that staff from all protected group fare well in relation to equal pay

3.3 Training and development opportunities are taken up and positively evaluated by all staff


Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Green	Age	<ul style="list-style-type: none"> NHS Staff Survey

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(Achieving) 	Gender Reassignment Marriage and Civil Partnership Pregnancy and maternity Race Religion or Belief Sex	<ul style="list-style-type: none"> Local NHS data and surveys Data on take up and evaluation of local training and development opportunities NHS England Assurance reports. CCG Staff Appraisals & Personal Development Plans (PDPs) Staff Clinical Supervision
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The CCG is not fully assure as there is not full staff data on training opportunities across all protected groups

3.4 When at work, staff are free from abuse, harassment, bullying and violence from any source

Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Amber (Developing) 	Age Disability Sex Race	30% of the 58 respondents (19 people) to the staff survey said that they have experienced bullying at work in the last 12 months – however, no staff or colleague formally reported the above bullying incidents to the CCG. <ul style="list-style-type: none"> NHS Staff Survey local NHS workforce data and surveys and the monitoring of grievance and disciplinary procedures NHS England Assurance Report CCG Bullying and Harassment Policy Staff Health and Wellbeing Group Union representation in the workforce

The CCG is currently assessing itself as amber in this area as we cannot assure ourselves because we do not have full staff data for all protected characteristic groups.


3.5 Flexible working options are available to all staff consistent with the needs of the service and the way people lead their lives

Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Green (Achieving) 	Age Disability Sex Race Pregnancy & maternity Religion and belief	The CCG is diligent in ensuring that flexible working options are available to all staff consistent with the needs of the service and the way people lead their lives: <ul style="list-style-type: none"> Flexible Working Policy NHS staff survey NHS workforce data and surveys NHS England Assurance Report.

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The CCG is currently assessing itself as green in this area as we cannot fully assure ourselves that we have full staff data reported across for all protected characteristic groups.


3.6 Staff report positive experiences of their membership of the workforce

Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Green (Achieving) 	Age Disability Sex Race Pregnancy & maternity Religion & belief	<ul style="list-style-type: none"> NHS Staff Survey NHS Workforce data and survey NHS England Assurance reports Staff appraisals

The CCG is currently assessing itself as green in this area as we cannot fully assure ourselves that we have full staff data reported across for all protected characteristic groups.

Goal 4: Inclusive Leadership

4.1 Boards and senior leaders routinely demonstrate their commitment to promoting equality within and beyond their organisations.


Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Amber (Developing) 	Age Disability Sex Race Pregnancy & maternity Religion & belief Sexual Orientation	<ul style="list-style-type: none"> Governing Body Member portfolios CCG has identified clinical leads for all programmes such as mental health, End of Life care, Diabetes etc. providing leadership roles outside of the Governing Body The Governing Body are aware of equality impacts as part of the business planning process

The CCG is currently assessing itself as amber in this area as we cannot assure ourselves all protected characteristic groups are being reached by the Governing Body.

4.2 Papers that come before the Board and other major Committees identify equality-related impacts including risks, and say how these risks are to be managed


Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
Green (Achieving)	Age Disability	<ul style="list-style-type: none"> All cover sheets of papers for the

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	Sex Race Pregnancy & maternity Religion & belief	Governing Body and all prime committees include a section for identifying equality related risks. <ul style="list-style-type: none"> • Equalities is included in the board Assurance framework which is presented at every Governing Body meeting. • There are a number of equality analysis or equality impact assessment reports with mitigated action on identified gap/risk that are formally presented and signed off by major committees. • The CCG has an established equality impact assessment process to help identify, document and mitigate any impact on people with protected characteristics.
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The CCG cannot fully assure itself that people across all protected groups are being reached through equality analysis and engagement.

4.3 Middle managers and other line managers support their staff to work in culturally competent ways within a work environment free from discrimination

Grade	Protected characteristics that fare well	Evidence drawn upon for rating.
 Green (Achieving)	Age Disability Sex Race Pregnancy & maternity Religion & belief Sexual Orientation	<ul style="list-style-type: none"> • NHS Constitution (rights & Pledges) • CQC inspection reports (well lead) • NHS Staff Survey • NHS Workforce data and surveys • Equalities Champions.

The CCG cannot fully assure itself that people across all protected groups are being supported to work in culturally competent ways within a work environment

Action Plan 2018-19

The action plan attached to the EDS2 summary report sets out the CCG's response to:

- The gaps and risks identified by the EDS2 self-assessment
- Implementation of equality guidance in the commissioning process

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- **Review of mechanism to monitor protected characteristics and implementation of the Accessible Information Specification represent the nine protected characteristics,**

Level of stakeholder involvement in EDS2 in, grading and subsequent actions:

For external assurance of the CCG's will need to work with stakeholders and organisations that broadly represented the nine protected groups. This validation process has yet to be undertaken

Risk Factors

There is no discernible risk to the CCG and are fully compliant with the CCG Improvement and Assurance Framework 2017-18 in implementing the mandated EDS2

Conclusion

The CCG has made good progress over the year to help ensure that there are systems in place to identify and respond to local needs in our commissioning process. However, it is clear that there is more work to be done, especially in ensuring our providers routinely collect and report on protected characteristic data.

There is the need to ensure that EIA's are embedded in the new PMO process and robust scrutiny of EIA's throughout the clinical & QIPP projects. There was a lack of consistent collection and analysis of protected characteristic group data across the whole health system specifically:

- A lack of robust systematic process for ensuring that our main providers routinely collect the protected characteristic group data, report on it and act accordingly.
- A lack of demographic data collected by GP practices, making it very challenging to inform whether protected characteristic groups fare better than others.
- A lack of rigour for ensuring Equality Impact Assessments (EIAs) were a formal part of the routine commissioning and procurement processes.
- Extensive engagement needs to be carried out with key disadvantaged groups in Greenwich using innovative methods, enabling the CCG to hear from protected characteristic groups,

Lack of data from providers on patient outcomes/feedback prevents us from fully evidencing whether the health needs assessments and services provided are fully responsive to the needs of protected characteristic groups

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Item	Objective	Action	Lead	Time Scale	Review
1	Map and review the use of data across the CCG, in terms of demographic data relating to access outcomes and experience	To develop the quality of data and information collected from providers and by the CCG, and used to improve existing and future commissioned services	Business intelligence team	April 2018 – March 2019	
2	Implementation of equality guidance in the commissioning process	<p>To ensure that Equalities is firmly embedded within CCG PMO/business planning processes</p> <p>To review business case template to ensure that there is a comprehensive Equality Impact Assessments checklist that includes all due considerations to yes/No impacts</p>	PMO Team	September 2018	

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		Develop an approach to Monitor impact of new services and communication on people with protected characteristics.		
3	Review quality assurance visit programme to include review of mechanism to monitor protected characteristics and implementation of the Accessible Information Specification.	Review & Amend Quality Assurance Visit Template	Carol Berry/Diane Goodenough	August 2018
4	Deliver face to face equality & diversity training and equality impact assessment training for the senior management team, commissioning and quality teams	Source and commission training sessions	Yvonne Leese/Carol Berry	July 2018

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5		Refresh the EIA template	Carol Berry/PMO	September 2018
	Develop a clear understanding and knowledge of the diverse range of communities and individuals in Greenwich, and capture and evaluate what they tell us about local health services	To ensure that robust process are in place to hear from protected characteristic individuals and communities, in order to continually inform our commissioning processes	Communication & Engagement team	April 2018-March 2019
6	Establish a Greenwich CCG Equalities Steering Group	To establish and maintain effective systems to manage and oversee the implementation of a strategic vision for equality, diversity and human rights across all healthcare commissioning and contracting decisions in Greenwich CCG.	Yvonne Leese/Fiona Marsden/Carol Berry	October 2018
7	Include Equalities into Contract Performance Monitoring	To monitor all commissioned providers on their provision of	Commissioning Team	October 2018

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services, ensuring that equality and diversity is embedded into contracts and delivery, and information on the needs and experiences of protected characteristics communities is being actively sought and acted upon.

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