

LLR CCG's WRES Action plan 2020 - 25

The Action plan aims to address any issues highlighted from the WRES data analysis and to close the gaps in workplace experience between white and Black, Asian and Ethnic Minority (BAME) staff. The plan also includes the requirements contained in the People Plan 2020 which states that 'Every NHS Trust and CCG must publish progress against the Model Employer Strategy goals' (to cover a period of 5 years). Where relevant these have been indicated in bold in the 'Action' column.

In May 2021, the Midlands Regional WRES team launched its Workforce Race, Equality & Inclusion Strategy which contains six high impact actions for local organisations such as the CCGs to initially work towards. The Regional Strategy directly places an emphasis on BAME workforce representation and covers all the protected groups. Where relevant, the link between the CCGs WRES and the 6 high impact actions have been included in a separate column in the action plan. Details about the 6 Actions can be found at the end of this action plan.

	Action	Action Required	Accountable Officer	Timescale	Link to Midlands High Impact Action	Outcome	Update 2020/21
No	Inclusive Leadership – leading with compassion: Demonstrating a commitment to becoming an inclusive and representative employer – role modelling on race equality. LINKS to WRES Indicator 9 & EDS* 2 Goal 4 & proposed EDS 3						
1.	The People Plan requires each NHS Board is to publish an action plan showing how board and senior staffing over the next 5 years will match BAME composition of the	Continue to maintain the current 40% BAME membership. Evaluate at next WRES Assessment.	Executive Director of People and Innovation	Review September 2021	High Impact Action 1	That the current BAME representation at Board and senior levels is maintained.	BAME representation at Board level increased from 40% to 43.2% during 2020/21

	overall workforce or local population - whichever is higher.	Also, continue to review and encourage BAME staff to attain senior management levels which is comparable to the local population at present.					
1.1	To further consider action planning to review diversity of senior grades and Governing Body membership across other protected characteristics such as sex, disability and sexual orientation with support from Governing Body members holding responsibility for equalities. This also includes responsibility and leadership of the system equality and inclusion strategy.	Action planning and review takes place on the makeup of the governing body across other protected characteristics.	Executive Director of People and Innovation	September 2022	High Impact Action 1	To work towards a representative Governing Body in relation to people's protected characteristics	The Governing Body is currently representative of the local population and further consideration will be given to the diversity of the Board as the ICS ICB is established
2.	VSMs and Board members to mentor/reverse mentor and sponsor at least five talented BAME staff members at band 8D or below. <i>(Source: Model Employer)</i>	Support is in place to enable this to happen. Continue to explore the reverse mentoring initiative with the LLR Academy.	Executive Director of People and Innovation	By September 2021	High Impact Actions 1 & 6	Board members to sponsor at least five BAME staff members band 8D or below. To enable an understanding/appreciation of the negative effects of discrimination	During the reporting period the LLR CCGs have matched 8 mentors and 8 mentees which exceeds the target set of 5.

						experienced by underrepresented groups; can empathise with the experiences of underrepresented groups including the concept of white privilege and become champions / ambassadors for quality and inclusion.	
2.1	Recruitment drive on BAME Non-Executive Directors (NEDs). (<i>Source: Model Employer</i>)	Existing NEDs encouraged and supported to play an active role in mentoring and sponsoring BAME staff that have the potential to get an executive role within three years. Support is in place to enable this to happen. Initiative to be explored with the LLR Academy.	Executive Director of People and Innovation	September 2023	High Impact Action 1	To maintain representation of BAME non-Executive Directors on the Board with ambition to gain an executive role.	N/A
3.	Named Executive Board member to hold responsibilities for reducing inequalities. (<i>Source: People Plan</i>)	To be appointed by September 2020.	Executive Director of People and Innovation	September 2020	High Impact Action 1	Complete	Complete
4.	Chief Executive to lead on equality, diversity and inclusion. Importance of	a. To enable this NHSE/I will publish competency	Chief Executive	October 2021	High Impact Action 1 & links to	Senior leaders and board members will have a performance	a) Performance objective?

	<p>senior leaders holding each other to account in this area. (Source: People Plan)</p>	<p>frameworks for every board level position within NHS providers and CCGs.</p> <p>b. Ensure ESMs 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:</p> <ul style="list-style-type: none"> Setting specific KPIs and targets linked to recruitment 			<p>actions above.</p>	<p>objective (linked to recruitment) on workforce race equality built into their appraisal process. (Source: People Plan)</p>	<p>CEX to confirm whether all EDs will have the objective (Aug 2021)</p> <p>b(i) In June 2021, Alice McGee, Executive Director of People & Innovation signed a pledge to implement the Midlands Workforce Race and Equality Strategy.</p> <p>b(ii) An external peer review of 'inclusive leadership' Goal 4 of the Equality Delivery System (EDS2) took place on 21/1/21. The CCGs have started to deliver the actions including leaders supporting EDI messages in communications on a regular basis. Positive EDI messages are being promoted to staff and the community and will assist with recruitment by ensuring we are an attractive place to work for underrepresented groups.</p>
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5.	Ensure that all Governing Body members and Senior Leaders undertake Equality and Diversity training.	Equality and Inclusion Development Session held for the Governing body on an Annual Basis.	Head of Corporate Governance/ EDI Business Partner	September/ October 2020 and annually	High Impact Action 6	For members to gain knowledge of their legal duties and have informed understanding of equality, diversity and inequality issues across all protected groups and those at risk of poorer health outcomes.	<p>To assist with meeting this objective - equalities training was provided to the Governing Board in October 2020.</p> <p>13 members of the LLR People Board attended cultural competence training in March 2021. This will be a valuable system tool in adopting different cultural thinking and processes across the system including recruitment practices.</p> <p>The Leadership Academy are looking to procure a cultural competency training intervention for the LLR. (August 2021.)</p>
Governance							
6.	Review governance arrangements and ensure that staff networks (which includes BAME) can contribute and inform decision making. (<i>Source: People Plan</i>)	Head of Corporate Governance to implement a process to ensure that the BAME Network (once formed) can contribute to decisions making process.	Head of Corporate Governance	December 2021	High Impact Action 1	Head of Corporate Governance to implement a process to ensure that the BAME Network can contribute to decision making decisions.	To be developed at LLR system level

6.1	<p>NEW: Equality Health Inequality Impact & Risk Assessments</p> <p>(EHIRAs) in decision making</p>	<p>HR teams to complete robust EHIRAs of recruitment policies</p> <p>Continued communication articles on the importance of undertaking EHIRAs.</p> <p>Governance to check that EHIRAs have been included with each report (when proportionally relevant).</p>	<p>Head of Corporate Governance / Assistant Director of People</p>	<p>Yearly review as part of Annual Reporting.</p>	<p>High impact Action 4</p>	<p>To achieve 100% completion rate of proportionally relevant EHIRAs when accompanying reports to committees.</p>	<p>The 2021 peer review of the Equality Delivery System (EDS) 2 Goal 4.2. noted the need to increase the amount of Equality Impact Assessment's (EHIRAs) being completed and forwarded for consideration at Board level.</p> <p>The new ICS Governance structure will need to ensure EHIRAs are being presented with papers and a reason when they are not.</p> <p><u>High impact Action 4</u> specifies that EHIRA training is provided for HR staff. Three out of six HR/OD team members undertook EHIRA 2020/21. There is a programme of EHIRAs taking place on HR policies following the recent management of change.</p> <p>The LLR system is currently rolling out the</p>
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							Inclusive Decision-Making Framework which will strengthen and further embed equality and health inequalities considerations to decision making – in relation to services and workforce.
Positive action and support links to EDS Goal 3 - A representative and supported workforce							
7.	Review internal talent management processes to ensure that these have been equality proofed and are inclusively designed to ensure equality of opportunity for all staff.	Review the current system which is in place from an equalities perspective.	HR Lead	From September 2021	High Impact Priority 3	Clear, open and transparent talent management processes leading to an increase in underrepresented groups gaining senior management positions.	From high impact actions Solution to be developed at system level, to include: a. Creating a 'database' of individuals by system who are eligible for promotion and development opportunities b. Agree positive action approaches to filling roles for under-represented groups c. Set transparent minimum criteria for candidate selection into talent pools
8.	Develop a Black, Asian, and minority ethnic BAME	To explore options: 1) Link in with Leicester,	HR Lead with support from	September 2021	High Impact Action 6	Members of BAME staff have a support network in place and	1) Work to commence on establishing a system wide BAME

	<p>Staff Network (<i>Source: Model Employer</i>)</p>	<p>Leicestershire & Rutland (LLR) Academy who are already leading on a collaborative initiative or 2) CCGs work alongside primary care colleagues to develop joint staff networks (for example, via PCNs). 3) Removing barriers to help staff speak up</p>	<p>E&I Business Partner</p>			<p>an opportunity to influence the decision-making process.</p>	<p>network reflecting the regional Workforce Race Equality and Inclusion Strategy. We are working in collaboration with the regional EDI team in taking this forward. LLR EDI/Workforce representatives are meeting with network chairs (where networks are in place across partner organisations) in September 2021 to progress this work. 2) Report & Support tool is a LLR wide Equality, Diversity, and Inclusion (EDI) project. The aim of the Your Voice project is to create a system-wide online reporting tool for staff to report experiences of harassment, victimisation, and discrimination. The tool is still in development but will be accessed through</p>
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							the LLR Academy website.
9.	NHS / CSTF / Equality Diversity and Human Rights training – increase rate of completion.	Increase Electronic Staff Record (ESR) completion rate to 90%	HR Lead/Line Managers	March 2021	High Impact Action 4	To reach a minimum target of 90% of CCG staff have completed their E&D mandatory training.	3 Years compliance as of 31/06/21 91.10% All Employees (Workers excluding GP / Lay Members) 92.64% EHHIRA training has continued on a one-to-one basis when staff are commencing their EHHIRAs. Training is also provided upon request on a team basis e.g., recently delivered to Children and Families in 2021.
9.1	Access and time to undertake Equality Training (employers must also make sure all employees have access to 'Continuing Professional Development' CPD and have protected time to progress their learning) <i>Source: People Plan.</i>	Staff have access to CPD, and equalities training and are allowed flexible options to undertake them.		Ongoing			Staff are encouraged to complete all mandatory training in work time. Generally, all training and CPD is completed in work time and any exceptions will be discussed at the time of authorising the training
10.	Ensure under-represented groups are encouraged and supported to	Clear visible process in place.	HR/Comms	Ongoing		Talented under-represented groups can access	The CCG continues to communicate development / training opportunities to all staff. All staff working within

	attend local initiatives and development programmes targeted at BAME groups. (Linked to 8.1)					opportunities to develop.	<p>the CCG have access to East Midlands Leadership Academy courses which have programmes such as Working closely with different inclusion networks within the Midlands region to understand the local need we deliver a variety of programmes such as:</p> <ul style="list-style-type: none"> • Stepping Up Programme – The Stepping Up programme is a leadership development programme for aspiring black, Asian and minority ethnic (BAME) colleagues who work within healthcare (the NHS or an organisation providing NHS care). • Ready Now programme – Ready Now is an innovative, inspirational positive action programme which will enhance your skills, knowledge and
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							ability to succeed. Aimed at senior BAME colleagues who wish to develop towards board level positions, or a significantly more senior role.
11.	Continue to undertake enhanced staff risk assessments and provide reasonable adjustments for those who require it to work at home.	Assessments continue and are reviewed. Links with flexible working, psychological support, bereavement support of vulnerable groups, health and well-being conversations.	HR lead	Ongoing		To ensure those staff at highest risk of COVID-19 are assessed, protected and are offered flexible working arrangements and other support when required.	A majority of the CCG staff continue to work from home. A range of support mechanism have been implemented and staff are required to complete a Display Screen Equipment (DSE) assessment and raise any concerns with their line manager. These can also be raised with Corporate Governance to ensure appropriate adjustments / support is implemented which may include support from Occupational Health if required. Staff have access to Care First the CCGs Employee Assistance Programme. A new Home Working Policy and Health & Wellbeing being policy will be published in

							October 2021. The latter includes information about wellbeing conversations (what they are / how to complete them / what actions can be taken). These conversations are happening regularly both formally and informally across the CCG.
Diverse Workforce: recruitment & selection: Relative likelihood of staff being appointed from shortlisting across all posts Links to WRES Indicator 1 & 2 and EDS Goal 3 - A representative and supported workforce							
12.	Explore the development of diverse shortlisting and interviewing panels. <i>(Source: Model Employer)</i>	A clear process to ensure that unconscious and conscious bias does not play into recruitment decisions by continuously reviewing the process and diversity of the selection panels.	Recruiting managers	March 2021	High Impact Action 2	Ensure recruitment is fair and unbiased.	The LLR system equality and inclusion plan will include collective actions and approach to hold each other to account for practices and ways of robustly ensuring a transparent and fast pace to ensure representation from the population. The outcome is to ensure a step change year on year to be representative of the population through clear, transparent and

							<p>unbiased approaches to recruitment. This will include a 'recruit from the population' approach using reach out methods and utilising apprentices.</p> <p>As part of the unconscious bias agenda - we are rolling out the Active Bystander programme as part of our LLR System People Plan, which aims to foster an inclusive, accessible, and civil culture for our service users and staff. At the heart of this work is creating a sense of belonging where everyone feels valued and respected. The programme is about stopping bad behaviour (uncivil) by staff within the system using preventative methods, working alongside the policies and procedures that are already in place.</p>
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							The CCGs Recruitment and Selection Policy has been updated to include representative interview panels
13.	Consider joined up approaches to recruitment by linking in with system partners to attract, recruit and retain talented under-represented groups through hosting specific open days, job fairs at local events post COVID-19.	To explore possibility with system partners.	HR Lead/ System partners	TBA post COVID-19		Increased applications from under-represented groups which will result in more representation (or continued) of underrepresented groups working at the CCG.	
14.	Explore the possibility of developing an online recruitment and selection training programme for recruiting managers.	To explore and implement an online recruitment tool.	HR Lead	September 2021	High impact action 6	Increased awareness of bias and how this can lead to bias in decision making (recruitment and selection). All recruiting managers are trained in recruitment and selection and have an appreciation and better understanding of the negative impact of bias.	The CCG use TRAC and online recruitment tool to manage recruitment activity and some on-line training is available to support recruiting managers
15.	A full review of the recruitment and promotion approaches that will see a step change to ensuring	System equality and inclusion plan will include collective actions and approach	Executive Director of People and Innovation	From 2021	High Impact Actions 2 & 5	A step change year on year to be representative of the population through	To be addressed both locally and a system. CCG implemented apprentice programme

	that staffing reflects diversity of the community across all bands and role types. <i>(Source: People Plan)</i>	to hold each other to account for practices and ways of robustly ensuring a transparent and fast pace to ensure representation from the population.				clear, transparent and unbiased approaches to recruitment. This will include a 'recruit from the population' approach using reach out methods and utilising apprentices.	commencing Summer 2021.
Data collection: LINKS to WRES indicator 4							
16.	Consider ways to collect data across LLR on number of staff accessing non mandatory training and development desegregated by protected characteristic.	A single access point for training to monitor access throughout the year, trends and gaps in BAME staff accessing training.	HR Lead	October 2021		Transparent reporting on the numbers of White and BAME staff accessing non mandatory training and CPD events.	Option appraisal to be developed to identify most appropriate way to harvest ITNs from PDR documentation and resource implications
17.	Ensure data sets are complete and underpin an understanding of inequalities. This includes: a) workforce b) community (Links with People Plan)	Keep current system under review.	MLCSU Workforce Information team	a) September each year b) Complete		a) Workforce data is understood in terms of reflecting the community profile b) The E&I MLCSU Team has produced the 'Know Your Patch' datasets to assist commissioning, EIAs etc.	a) Updated and contained in the EDI Annual Report 2020-21 b) As per 2020

Staff Survey: Links to WRES indicators 5-8

18.	To undertake the NHS Staff survey.	Implement the Staff Survey.	HR Lead	Results available in February 2021 & ongoing annually.		To gain an insight to see if any issues including harassment, bullying, victimisation or discrimination is taking place.	<p>Completed survey and local action plans agreed including development of directorate/CCG organisational behaviours to be included in OD development programme Nov 21</p> <p>Implement Pulse Survey quarterly wef July 2021</p> <p>Signed up to National Staff Survey October 2021</p>
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Regional 6 High Impact Actions

Employers in the NHS should...	Outcomes we seek to achieve
<p>Action 1: Ensure ESMs 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:</p> <p>a) Setting specific KPIs and targets linked to recruitment. b) KPIs and targets must be time limited, specific and linked to incentives or sanctions</p>	To reduce/eliminate impact of unconscious bias during interviews to increase likelihood of appointing candidates from diverse backgrounds to post
<p>Action 2: Introduce a system of 'comply or explain' to ensure fairness during interviews</p> <p>This 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.</p>	To increase diversity of talent pools in order to increase likelihood of appointing candidates from diverse backgrounds to post
<p>Action 3: Organise talent panels to:</p> <p>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 staff b) Agree positive action approaches to filling roles for under-represented groups c) Set transparent minimum criteria for candidate selection into talent pools</p>	To embed accountability and make workforce diversity an organisational priority in order to increase likelihood of appointing candidates from diverse backgrounds to post

Employers in the NHS should...	Outcomes we seek to achieve
<p>Action 4: Enhance EDI support available to:</p> <p>a) Train organisations and HR policy teams on how to complete robust / effective Equality Impact Assessments of recruitment and promotion policies b) Ensure that for Bands 8a roles and above, hiring managers include requirement for candidates to demonstrate EDI work / legacy during interviews.</p>	To make workforce diversity an organisational priority in order to increase likelihood of appointing candidates from diverse backgrounds to post
<p>Action 5: Overhaul interview processes to incorporate:</p> <p>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 approach c) Consider skills-based assessment such as using scenarios.</p>	To close/reduce inequality gaps during interviews to increase likelihood of appointing candidates from diverse backgrounds to post
<p>Action 6: Adopt resources, guides and tools to help leaders and individuals have productive conversations about race</p>	To enable tangible progress on equality, diversity and inclusion for all staff and increase staff retention and likelihood of promoting candidates from diverse backgrounds