


Equality, Diversity and Inclusion (EDI) Policy and Strategy 2023-27

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[At each formal approval by a Committee the version should be reflected as 1.0, 2.0 etc...where minor amendments are made outside of Committee approval the version should be reflected as 1.1, 1.2, etc.]

Hertfordshire and West Essex Integrated Care Board

Equality, Diversity and Inclusion (EDI) Policy and Strategy 2023-27

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1. Purpose

This document sets out how the Hertfordshire and West Essex Integrated Care Board (ICB) will meet the equality Duties, as set out in the Equality Act 2010 and subsequent Regulations, and the health inequalities Duties in the Health and Social Care Act 2012. This strategy has been developed to meet the statutory Duties and to achieve our aim of embedding the principles of equality and diversity throughout the work of the ICB.

Our equality, diversity and inclusion strategy builds upon what we have already achieved and pledges to address inequalities for our people, patients and communities with real purpose and action.

2. Who we are and what we do

The ICB is the local NHS organisation that plans and oversees how NHS money is spent and makes sure health services work well and are of high quality.

The ICB's role is to join up health and care services, improve health and wellbeing and reduce health inequalities.

We have a budget of around £2.8 billion, for the 1.5 million people who live in this area. The budget is set by NHS England. This budget covers both the services we commission and staff and running costs.

3. What is Equality Diversity and Inclusion?

Equality is about fair treatment, and we believe that employment and our services should be accessible to all. Everyone has individual needs and the right to have those needs respected.

Diversity is about respecting difference and can include individuals and groups with varying backgrounds, experiences, perceptions, values and beliefs. It is important that we understand, value and respect those differences.

Inclusion is about recognising and valuing the differences we each bring and creating an environment where everyone can be their true selves and has equal access to services, opportunities, resources and can contribute to the organisation's success.

4. Equality Policy

We value the diversity of our local community and workforce and believe that Equality, Diversity and Inclusion is central to the commissioning of modern, high quality health services focused on the patient.

As an employer we will provide a positive, inclusive and fair workplace culture free from discrimination. Our staff will ensure they are consciously inclusive in their day to day practice and interactions, removing inequality in the provision of both health services and employment practices.

We embrace diversity and seek to recognise and value differences through inclusion. We recognise that equality is not about treating everybody the same. Instead, it is about ensuring that access to opportunities is available to all by taking account of people's differing needs.

5. Our constitution

Our Integrated Care Board (ICB) is responsible for planning, commissioning and coordinating health care services in Hertfordshire and West Essex, in order to:

- improve the general health and wellbeing of Hertfordshire and West Essex residents, and improve health and care services in the area
- tackle the inequalities which affect people's physical and mental health, such as their ability to get the health services they need and the quality of those services
- get the most out of local health and care services and make sure that they are good value for money
- help the NHS to support social and economic development in Hertfordshire and West Essex.

The Board is directly responsible for spending the money allocated by the NHS for our area, and for the satisfactory performance of health services within our [Integrated Care System](#) (ICS).

The members of [our Board](#) will work to ensure that the Board's resources and powers tackle complex challenges, including:

- improving the health of children and young people
- supporting people to stay well and independent
- acting sooner to help those with preventable health conditions
- supporting those with long-term conditions or mental health issues
- caring for those with multiple health needs as they age
- getting the best from the collective resources of the health service, so that people get the care they need as quickly as possible.

6. The role of people and communities

Strong and effective systems have a deep understanding of the people and communities they serve. Our Board will actively seek to strengthen work with the people and communities in our area, building on existing relationships, networks and activities, and embedding the positive engagement practices.

The ICB's approach to working with people and communities, ensuring that joined up, person-centred care lays at the heart of its decision making, can be read in our governance handbook, available on the ICB website.

7. Our corporate vision, values and objectives – The Hertfordshire and West Essex Way

Our ICB is focused on making sure we are doing the best for local people and that together we are improving health and wellbeing in Hertfordshire and West Essex.

If believe that if we look after each other as colleagues and work really well together, we create the best chance of success.

The HWE Way sets out how we will do this –and how we will work with our partners and the public too.

We will:

Show kindness

This means we check-in on how colleagues are, we notice people, and follow-up if we know all is not well. We consider colleagues' feelings and we thank each other for the small and the big things they do that help.

Listen and respect

This means we take time and we make the effort to listen to what others have to say. We show clearly that we are listening. We respect others' skills, experience and expertise because none of us know it all, and we are open -not just to hearing other views -but also to taking them on board. We value diversity in all its forms.

Be friendly

This means we greet and introduce colleagues at meetings in an open and friendly way. We make sure that everyone present has a chance to be heard. We will take a warm and friendly tone when we meet online or in person, and our emails are thoughtful and courteous.

Be honest

This means we are straight-talking when we share news and views. We speak up if we think something isn't right or isn't going well. We offer alternative views or suggestions in a positive way.

Be open

This means we share information with other people in a helpful and timely way, telling them what we know, and what we think. We do this clearly and positively. When people make suggestions, or challenge our views, we will be open to those different opinions and think them through carefully.

Communicate well

This means we pass on information clearly to everyone who needs it, using accessible language and avoiding jargon. We take personal responsibility for finding things out when we don't know something.

Develop strong relationships

When we challenge, we do this in a positive way, and not on a personal level. We ask for help when we need it –and in turn we give help willingly. We say 'sorry' if we're in the wrong, and we are gracious and kind when others apologise.

Work together to get something right

We work on issues together, being clear about our shared purpose, finding solutions that work. We learn from our successes –and we build on those. We also acknowledge when we have made mistakes and learn from them.

8. How we will meet our legal and regulatory requirements

The following sections detail our legal and regulatory requirements. Some are required by law, for example the Equality Act 2010, and others are required by the NHS, for example the Workforce Race Equality Standard.

The ICB is committed to meeting national and regional requirements and these are listed below. As a commissioner of services across the Integrated Care System (ICS) we also have the responsibility to ensure that those who we commission services from are meeting, where required, these requirements.

Copies of our equality reports are published on our website at <https://hertsandWestessex.icb.nhs.uk/us/equalities-reports>

The Equality Act 2010

In line with the Equality Act 2010, there is a duty for all public bodies to consider how their decisions and activities as a service provider and employer affect people who share different protected characteristics covering:

- Age
- Disability
- Gender
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race, including ethnic or national origins, colour or nationality
- Religion or belief
- Sex
- Sexual orientation

Public Sector Equality Duty

The Equality Act 2020 is made up of a general duty and specific duties which places various duties on the ICB.

The general duty has three aims and requires us to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimization and other conduct prohibited under the Act
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The specific duties require the ICB to publish details of how the ICB is meeting the above duties, publish equality objectives and demonstrate inclusive decision making. The publication requirement is met through this annual report and the ICB Annual Report, available in the About Us section of the ICB website.

The Public Sector Equality Duty also requires that the ICB prepare and publish one or more objectives which they think they should achieve to meet the requirements of the Public Sector Equality Duty. The ICB has produced an overarching action plan for the next four years (2023-27) to give a clear direction of travel to the EDI work in the organisation.

This is drawn from our consideration of the findings of EDS 2022, the annual workforce data report, the NHS Staff Survey and other statutory and NHS requirements.

| Area of Work | Action | Expected Outcome | Person Responsible |
|--------------------------------|---|---|---|
| Statutory and NHS requirements | The Integrated Care Board (ICB) will meet its statutory and NHS obligations, including those required by the Public Sector Equality Duty, Gender Pay Gap reporting, the NHS Equality Delivery System and the NHS Six High Impact Actions for equality | Statutory and NHS reports and publications meet the expected standards and publishing deadlines are met. | Chief Executive Officer |
| Staff Training and Development | The ICB will develop and deliver a suite of equality, diversity and inclusion training and development opportunities for staff. This will include mentoring | Staff understand how equality, diversity and inclusion is central to the work of the ICB. Staff will be better equipped to support themselves, and each other, to | Associate Director- Organisational Development, Leadership, Education and Culture |

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| | opportunities for under-represented groups, Active Bystander training and linking with system partners to deliver Cultural Awareness training for staff. | address discrimination and under-representation. | |
| Recruitment | The ICB will create a plan with explicit improvement targets to meet the A Model Employer representation targets . | A clear plan for meeting the A Model Employer targets is in place. | Chief People Officer |
| Wellbeing | Using health and equality data the ICB will develop and introduce a series of wellbeing initiatives to support staff. This will include promoting the support services available to staff and face to face and virtual events to enable staff to network and discuss concerns and solutions. | The NHS Staff Survey and local pulse surveys show that staff wellbeing and feeling of belonging in the ICB is improving year on year | Associate Director- Organisational Development, Leadership, Education and Culture |
| Governance | The ICB will ensure that governance processes relevant to equality, diversity and inclusion (EDI) are robust and effective. | The ICB will be able to show how governance processes support and contribute to the organisation meeting its legal duties and other responsibilities. | Chief of Staff |

Health Inequality Duties

The Health and Social Care Act 2012 introduced the first legal duties on health inequalities, with specific duties on NHS England and ICBs. These duties took effect from 1 April 2013.

ICBs have duties to:

- Have regard to the need to reduce inequalities between patients in access to health services and the outcomes achieved;
- Exercise its functions with a view to securing that health services are provided in an integrated way where it considers that this would—

- (a) Improve the quality of those services (including the outcomes achieved from their provision),
 - (b) Reduce inequalities between persons with respect to their ability to access those services, or
 - (c) Reduce inequalities between persons with respect to the outcomes achieved for them by the provision of those services.
- Include in an annual commissioning plan an explanation of how they propose to discharge their duty to have regard to the need to reduce inequalities;
 - Include in an annual report an assessment of how effectively they have discharged their duty to have regard to the need to reduce inequalities

Due Regard

Paying due regard involves considering the aims of the duties – the equality and/or health inequality duties - in a way that is proportionate to the issue at hand. Decision makers should ensure that they consider the impact of proposals with rigour and with an open mind, in such a way that influences the final decision.

This must happen before, and during, policy formation and when making a decision. Case law has established that it is important that decision makers give proper, informed consideration to equality issues at the right time and that a record of that consideration is kept.

Undertaking an Equality and Health Inequality Impact Assessment (EqIA) is one of many tools supporting the ICB to meet the duties. All proposals to stop, start or change a policy, practice or procedure will be accompanied by an EqIA. It is important that any conclusions arising from the EqIAs influence our policies and practices.

The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017

The mandatory gender pay gap analysis requires us to report workforce data across gender and pay bands and develop an action plan to address any gaps or over/under representation.

We will report our data to the Government's Gender Pay Gap reporting portal as required by the legislation.

NHS equality, diversity and inclusion (EDI) improvement plan

[NHS equality, diversity and inclusion \(EDI\) improvement plan | NHS Employers](#)

The NHS England EDI improvement plan aims to improve equality, diversity and inclusion and to enhance the sense of belonging for NHS staff.

This improvement plan sets out targeted high impact actions to address the prejudice and discrimination – direct and indirect – that exists through behaviour, policies, practices and cultures against certain groups and individuals across the NHS workforce.

The plan specifies six high impact actions that all NHS organisations are required to implement. Each action has a series of deadlines (which can be seen using the link above) with the final deadline for implementation of all actions by March 2026, so within the lifetime of this policy and strategy. The ICB is committed to implementing the actions by the deadlines.

The six actions are:

1. Chief executives, chairs and board members must have specific and measurable EDI objectives to which they will be individually and collectively accountable.
2. Embed fair and inclusive recruitment processes and talent management strategies that target under-representation and lack of diversity.
3. Develop and implement an improvement plan to eliminate pay gaps
4. Develop and implement an improvement plan to address health inequalities within the workforce.
5. Implement a comprehensive induction, onboarding and development programme for internationally recruited staff.
6. Create an environment that eliminates the conditions in which bullying, discrimination, harassment and physical violence at work occur.

NHS East of England Anti-Racism Strategy

The ICB is committed to supporting the NHS East of England Anti-Racism Strategy. The following principles, from the Anti-Racism Strategy, have informed the development of our ICB, policy and strategy and action planning.

- We will support leaders, managers, and people to understand the impact of racism and to be anti-racist.
- We will address the lack of representation in leadership and decision making.
- We will support our BAME colleagues by creating cultures of civility, respect and safety.

The NHS Equality Delivery System

The ICB uses the NHS Equality Delivery System as a performance improvement framework to deliver and monitor our progress against our statutory requirements. NHS commissioners and providers are expected to use EDS to help them improve their equality performance for patients, communities and staff, as well as helping them to meet the Public Sector Equality Duty.

The EDS comprises eleven outcomes spread across three Domains, which are:

- 1) Commissioned or provided services
- 2) Workforce health and well-being
- 3) Inclusive leadership.

We will continue to work with our stakeholders to review our performance and identify areas for improvement.

The ICB 2023 EDS report is available at

<https://hertsandWestsex.icb.nhs.uk/us/equalities-reports>

We are working with our partners in the ICS on the development and assessment of the 2024 EDS requirements.

The NHS Workforce Race Equality Standard (WRES)

The NHS Workforce Race Equality Standard (WRES) aims to ensure employees from Black and Minority Ethnic (BME) backgrounds have equal access to career opportunities and receive fair treatment in the workplace. It requires the ICB to demonstrate progress against nine standard indicators specifically focused at race equality through the collection, analysis and use of workforce data to address any underrepresentation, poor treatment or unequal opportunities.

The NHS Workforce Disability Equality Standard (WDES)

The NHS Workforce Disability Equality Standard (WDES) is a set of specific measures (metrics) that enables us to compare the experiences of disabled and non-disabled staff. It supports positive change for existing employees and enables a more inclusive environment for our employees.

Equality Impact Assessment (EqIA)

An EqIA is a tool that helps us to understand how our policies, practices and service provision impact on people, positively and negatively, and put actions in place to remove or remove any disadvantage. They help us to identify any further actions that need to be taken to support all protected groups, whether patients or employees.

The Equality Impact Assessment process will be used to assess whether there may be any barriers or difficulties, harassment, or exclusion as a result of a planned change, or in fact any positive impact such as the promotion of equality of opportunity, developing good community relationships, encouraging participation and involvement as experienced by service users, patients, carers, relatives, staff, the general public and key stakeholders.

10. Equality and diversity assurance – our governance

Hertfordshire and West Essex Integrated Care Board ensures that the robust consideration of equality is a part of our governance by conducting equality impact assessments (EqIAs) and acting on the evidence or outcomes presented.

EqIAs are part of our core business and all proposals to stop, start or change a policy, practice or procedure will be accompanied by an EqIA.

This ensures that the decisions made support the ICB to retain a robust, fair and compliant process towards commissioning principles, procedures and service delivery.

We will continue to strengthen the EqIA process to ensure it is user friendly, fit for purpose and robust.

We will continue to train decision makers in how to pay Due Regard to the duties set out in the Equality Act 2010.

A newly established ICB Equality and Diversity Group meets to consider EDI matters in the ICB and reports through the ICB committee structure.

There is also an EDI group at an ICS level that meets regularly to consider EDI at a system level.

11. Planning and commissioning services

We will ensure that consideration of the objectives of Service Condition 12 of the NHS Standard Contract (*Communicating with and involving Service Users, Public and Staff*, which covers the Accessible Information Standard) and Service Condition 13 (*Equality of Access, Equality and Non-Discrimination*) forms part of our planning and commissioning of services.

This will support the ICB to ensure that we design and commission appropriate services and ensure that providers meet the requirements of all the communities of Hertfordshire and West Essex.

We will hold our provider organisations to account through equality and diversity performance indicators, which will be monitored as part of the contract and clinical quality review processes. We will expect those commissioning services on our behalf to implement a similar robust process as part of their own contract compliance process.

12. Embedding equality and diversity into our business

We want our message to be that putting equality and diversity into the core business of the ICB is the key to successfully delivering outcomes that meet the needs of the people who live in Hertfordshire and West Essex and for our employees. The ICB will ensure that this message is understood by the ICB and our providers, including primary care providers.

We will ensure that equality and diversity is considered in how we manage and work with people and in the services we commission and/or provide.

All staff are required to undertake equality and diversity training. In addition, relevant specialist training, such as on completing Equality Impact Assessments (EqlAs) and using equality data, will be made available to staff as needed.

Managers and their staff have personal responsibility for challenging discrimination and unacceptable behaviour. Managers and staff will receive appropriate training to support them to understand that they must behave in ways that promote a culture of inclusion and equality for all. This will be monitored through staff performance against meaningful and measurable personal objectives.

We will continue to develop actions plans with key performance indicators to measure progress at corporate and directorate level. A robust system of measurement and evaluation will provide assurance that action plans are effective.

We will continue to meet the Public Sector Equality Duty publication requirements.

We will use the data collected to continue to develop our equality action plan so that it is current and relevant to our work.

13. Review

This policy will be reviewed annually to ensure that it remains up to date and 'fit for purpose'.