

**NHS Bury Clinical Commissioning
Group / Bury Council
Joint Inclusion Strategy
2021-2024**

Bury Council and Bury Clinical Commissioning Group Inclusion Strategy 2020-2024

1. Introduction

The Bury Council and CCG partnership has, through the leadership of the Strategic Commissioning Board, made a commitment to significant improvements in our equalities and inclusion practice as both an employer and service provider/commissioner. This commitment is made as part of our leadership role in delivering the Bury 2030 vision and wider organization transformation.

An independent review into internal practice was undertaken in Summer 2020 and, as a result, this Inclusion Strategy has been co-produced with staff groups; community leaders and senior champions. It sets out:

- The context for this work including the current disparity in outcomes across different communities and how the Bury 2030 vision intends to address this
- The general legal equalities duties on the Council and CCG and how these will be met
- Organisation-specific inclusion objectives and an action plan initially for delivery to 2022.

The term inclusion has been intentionally used for this strategy as it incorporates equality, diversity and human rights, and our legal requirements under the Equality Act. Previously Bury Council and Bury CCG have used a combination of these terms, so inclusion provides a common term to corral around given this is a joint strategy and encompasses the intent to promote equal access and take up of opportunities; to respect and celebrate diversity; to protect and raise human rights, of all people across the Borough.

2. Context

2.1 Outcomes

Bury is a vibrant, diverse and cohesive Borough. It is home to 190,000 people, every one of which should be enabled and empowered to maximise their life chances, play a full and active role in society and enjoy a high quality of life.

Sadly, we know that this vision is not currently being fulfilled. Too often, too many people in the Borough have not had the opportunities to be heard, be included or feel represented. Social inequality produces an unacceptable variation in life chances between different communities and the Covid pandemic is likely to broaden social inequalities, including the disproportionate impact of the virus on black and minority ethnic (BAME) communities.

Comparison of whole life expectancy and healthy life expectancy between the Borough of and communities in Bury and national average are two overarching measures which tell us about the health of our population. After decades of improvement, increases in life expectancy for Bury people have stalled. Life expectancy and healthy life expectancy in Bury is lower than the rest of the country.

Beneath these overall trends lie stark inequalities with differences in life expectancy between the most and least deprived areas within Bury of 11.3 years for men and 8.5 years for women and of 14.8 years for males and 13.4 years for women for healthy life-expectancy. There are no signs of these inequalities narrowing.

While as a Borough we are still relatively less deprived than our statistical neighbours and other GM districts, our trend is a negative one with deprivation now getting worse relative to other places. Deprivation in Bury remains highly concentrated and centers on the same areas as before. In the most deprived parts of Bury the onset of poor health begins at age 54 for men and 56.5 for women, up to 13 years before state pension age and life-expectancy of only around 4.5 years beyond.

Inequalities also exist across other dimensions including ethnicity, gender, sexuality and having a disability. The workforce indicators show a decline of women in employment and also people with a disability. This suggests we are further away from creating an inclusive economy than we were five years ago.

2.2 Bury 2030 vision

The Bury 2030 strategy makes a strategic pledge to tackle inequalities with a clear pledge to drive inclusion, as one of five outcome measures which are:

- **Inclusive** communities
- **Healthy**, connected people
- A strong **economy**
- Be on the way to **carbon neutrality**
- A **digital**-first approach

The inclusion vision for Bury 2030 is to enable every person in the Borough to fully participate in and shape the collective, by supporting people to be themselves; to speak out about ideas and concerns and to be heard. It describes commitments to develop relationships; create new and developed fora to hear every voice and co-design services with the people who use them, as well as ongoing community safety activity which drives cohesion through a culture of trust, tolerance and understanding.

Four key principles underpin this vision, for a “people powered” Bury where everyone demonstrates common behaviors which support inclusion. The 2030 strategy will be led by the Team Bury partnership which includes a range of

organisations and interest groups of particular relevance including the Voluntary, Community and Faith Alliance, ADAB, Faith Leaders’ Forum and Healthwatch.

<p>Inspiration – We are proactive and creative, building on our collective strengths to make a difference to what matters most to us by:</p> <ul style="list-style-type: none"> • Really listening to understand each other and our shared potential • Growing relationships & new connections across boundaries • Being open to trying new things and doing things differently • Valuing the skills, strengths and successes of individuals and communities 	<p>Aspiration – We realise hopes and dreams by:</p> <ul style="list-style-type: none"> • Demonstrating pride in our collective and individual achievements and in the place where we live • Ensuring everyone has an equal voice and equal life chances by harnessing and nurturing all talents • Championing innovation, always looking for ways to improve quality of life for all • Being courageous and stepping out of our comfort zone to help ourselves and others • Opening doors at every opportunity
<p>Participation – We all take responsibility for making a difference by:</p> <ul style="list-style-type: none"> • Committing to making a positive, practical difference in addressing and tackling our challenges • Asking ‘what matters to you?’ and ‘How can I help?’ • Being flexible and putting our energies where we can make the most positive difference • Demonstrating dignity, kindness and respect in everything we do 	<p>Collaboration - We will bring our collective talents, energies and power together for the greater good by:</p> <ul style="list-style-type: none"> • Bringing people together from all corners of life • Listening and learning from all voices • Trusting and helping each other, always working together • Listening when others talk and then responding, helping and enabling • Supporting development and growth and removing barriers to collaboration

The specific actions to drive inclusion, based on feedback from local people, are:

- Ensuring there is an understanding of the diverse communities in Bury; we will do this by acting to create a workforce that is representative of Bury’s diverse communities, that our staff understand unconscious bias and how to overcome it and that all our services and processes further equality through high quality equality analysis of every change we make.
- further developing inclusive community engagement structures in order to strengthen engagement opportunities for Bury’s diverse communities. This will range from encouraging communities of interest to share their views on how their needs are best met and influence how services should

be delivered and commissioned to give communities the power to make and share decisions and provide services with us.

- Taking an equity-based approach to targeting public resources across the population in order to create the conditions where every person has access to the conditions to achieve their full potential.
- Celebrating and engaging the diversity of our borough by ensuring that our events, activities and service provision represent the strength of our entire community and invite and support 'difference'. During the year we celebrate Christmas; Easter; Diwali; Eid; Hanukkah; Rosh Hashanah and Yom Kippur. The Bury Pride festival is the second largest in Greater Manchester outside Manchester.
- Engaging our children in an inclusive society. For example, the Community Safety Partnership leads an annual event with school children to explore different faiths and promote cohesion.

More widely the overall philosophy of the strategy is to protect the most vulnerable; drive economic growth and ensure all residents have the skills, opportunity and confidence to access the opportunity growth brings. Other actions which support inclusion and tackle inequality within the vision include:

- safeguarding the welfare of vulnerable children and adults
- provision of all-age Learning Disabilities services
- the development of a neighbourhood model of public services to develop greater understanding of local community issues and joined-up public services to respond
- Ensuring that our streets and neighbourhoods are safe, cohesive and accessible
- raising the profile of volunteering and community action
- pursuing digital infrastructure as a lever for inclusion
- the use of apprenticeships to create opportunities for young people in particular and the wider Supported Employment offer including the current Kickstart initiative with DWP to give those not in education or employment placement opportunities and support to become work ready
- Ensuring that wider issues around vulnerability, disadvantage and poverty are at the heart of our decisions. The development of the Council's anti-poverty strategy is a key part of the Covid recovery work and includes work to support food banks; provide financial and benefits support to residents who are out of work or experiencing in-work poverty and to facilitate an "opportunity guarantee" to give every person looking for support, coaching or work opportunity the resources to progress

3 Compliance with legislative requirements

As public services the Council and CCG operate within the context of the following legislation:

- The *Equality Act 2010* (The Act) brings together all the legal requirements on equality that the public, private and voluntary sectors need to follow. It protects people from discrimination, harassment and victimisation on the basis of their 'protected characteristics', namely:
 - sex;
 - gender reassignment;
 - race;
 - disability;
 - sexual orientation;
 - age;
 - religion or belief (or lack thereof);
 - pregnancy and maternity and;
 - marriage or civil partnership.

In addition, four further communities of interest have been identified locally which, in Bury, will be approached as protected characteristics and included in our Equalities Assessment process. These are:

- carers
- our Looked After Children and care leavers
- Military Veterans
- socio-economically vulnerable

Under section 149 of the Act, 'the Public Sector Equality Duty', Bury Council and Bury CCG need to have 'due regard' in everything they do in order to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Take steps to meet the needs of people from protected groups where these are different from the needs of other people'
- Foster good relations between people who share a protected characteristics and those who do not.

Having due regard involves the Council and CCG:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in order activities where their participation is disproportionately low.

Public sector equality duty also states that the council and CCG should have due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

In addition, as public sector bodies, the council and CCG are required to meet some specific public sector equality duties. These are to:

- Publish the equality objectives which the partnership is seeking to deliver.
 - Publish equality information annually to show how we are complying with the general equality duty, in relation to its workforce and its services. Information must be published at least annually.
- The *Human Rights Act 1998* requires all public bodies, including the Council and CCG, and those acting on behalf of public bodies to act in a way that respects and protects an individual's human rights.
 - The *Health and Social Care Act 2012* introduced legal duties to reduce health inequalities (for CCGs). The CCG is required to consistently 'have due regard' to the need to reduce inequalities between patients in access to health services and the outcomes achieved. Bury CCG have incorporated this into the Equality Analysis template to assist with the decision-making process.
 - The *Accessible Information Standard (AIS)* requires all organisations that provide health services (including GP practices or adult social care to identify, record, share and meet the communication needs of patients/ recipients of care who have a disability, impairment or sensory loss.

The Strategic Commissioning Board ensures compliance with these general equalities' objectives by:

- Ensuring every decision is equality assessed, to ensure it reflects the duties of preventing discrimination; fostering good relations and advancing equality of opportunity. The strength of the Equality Assessment process is one of the areas of work that is proposed to be addressed this year.
- Articulating internal Inclusion Objectives in our capacity as both service provider/commissioner and employer at the heart of our Corporate Plan. The objectives for the next 12 months are set out below.

- Engaging Team Bury partners, businesses and investors in our Inclusion strategy to role model and seek to embed wider good practice, as community leaders
- Reporting progress and outcomes of the Inclusion Objectives to the Strategic Commissioning Board as part of quarterly reviews against the Corporate Plan set annually
- Overseeing the maintenance of Human Resources (HR) policies which are clear about eliminating discrimination in the workplace and ensuring fair and equal opportunity to staff from all groups

4. Bury Council and NHS Bury CCG’s Inclusion Objectives 2020-24

4.1 Overarching objectives

The Council and CCG have defined the following seven joint Inclusion Objectives which apply to the next four years, consistent with the requirements of the Equalities Act, but will be reviewed annually as part of the Corporate Plan.

The objectives provide a continuum of activity, from regulatory compliance to leading the inclusion agenda through practice, which will help the Council and CCG deliver tangible actions to address inequality. Individually each objective is supported by a series of specific and measurable actions to help us progress against this continuum.

<p>1. Performance and Scrutiny : Establish effective governance arrangements in order to ensure that there is a robust performance management culture and scrutiny in relation to inclusion</p>
<p>Inclusion is to be at the heart of our strategic planning process, from Bury 2030, into the corporate plan, through the workplans of Cabinet members and portfolios and to the equality analysis of individual policy decisions.</p> <p>Scrutiny will take the form of both formal governance channels and through the wider sharing of inclusion intelligence across the Bury system and with our communities, to inform and empower, and in turn promote constructive challenge and change.</p> <p>The actions in the implementation plan will lead to an increasingly evidence-led based approach, aligned to the Greater Manchester reform principles to ensure resources, and in turn activity, are targeted to make the difference requirement to meet local needs and show the impact of such interventions.</p>
<p>2. Equality Data and Information: To use data more effectively to promote inclusion in all decision making by the Council and CCG, to help ensure due regard to the general equality duty</p>

Linked heavily with objective one, data will inform the nature, format and degree of activity. The identification, collation, analysis and sharing of information will include that of our population, ensuring that there is a 'live' understanding of the diverse communities in Bury and levels of inequalities within and between these communities. Data and outcome measures across the Bury 2030 ambition is under development and will be key to informing this strategy.

A critical element of this objective is the development of a high quality and robust approach to Equality Analysis on all policy decisions and proposed changes to services; being more data-driven, robustly reviewed, quality assured and consistently completed.

3. Community Engagement: Develop inclusive community engagement structures in order to strengthen community engagement opportunities for Bury's diverse communities

As outlined in relation to the Bury 2030 principles, communication and engagement with all local communities is a core priority of this strategy. This is about establishing dialogues and conversations with the diverse individuals and neighbourhoods which make up our six towns. Communication is two way and so is as much about amplifying voices as it is active listening.

Different approaches will be needed to engage with the diversity of communities of interest and experience, to encourage people to share their views on how their needs are best met (particularly how people can be enabled to be able to do this for themselves as resilient, active, connected citizens) and influence how services should be commissioned, delivered and evaluated. This is about giving communities the power to make and share decisions, particularly through our new neighbourhood model, to not just have a voice but have fora to use it.

4. Representative Workforce: To take steps towards having a workforce that is representative of the diversity of the local population

Our workforce is one of our strongest assets - this strategy seeks to strengthen this further. As public services our duties are to facilitate local people to achieve the best outcomes and quality of life they can. This is best met when the workforce is representative of the people it carries out its functions with.

We recognise the value of diverse workforce that reflects the community it serves. Increased diversity within the workforce leads to creativity and innovation, through a richer tapestry of skills, life experience and networks. A more diverse workforce brings the internal operations and external reality of those operations closer together, identifying opportunities to work differently and better address needs, improving outcomes as well as being a more effective use of resource.

An inclusive workforce, with opportunities for all to excel and progress, will raise inspiration and aspiration for careers within the Council and CCG, including attracting the best talent from our local communities. Similarly, it is important existing staff, regardless of their background, can see opportunities to progress so to retain existing talent to drive service improvements and develop greater representation of our communities at leadership levels.

5. Training and Learning: To raise awareness of people’s rights and responsibilities, and to aid the delivery and embedding of the Inclusion Strategy

Inclusion, through the promotion of equality, diversity and human rights is everyone’s business.

Internally it is essential our staff and non-executive members (Councillors/Clinical Leads) are fully aware, comply with and drive improvements in relation to inclusion frameworks as set out in objective 7. This includes for formal training, eg. on Equality Analysis, but also to embed a culture of learning and improvement. By learning about our diverse communities so to be better informed of particular priorities, opportunities and issues, services can be improved, whilst understanding unconscious bias and being able to overcome it will improve decision making at every level.

6. Improve user access and experience: Embedding inclusion into the commissioning cycle locally and seeking effective assurance, including from provider organisations

We will routinely harness the voices and creativity of all our residents in developing future plans. Bury 2030 is an example of this in action, the plan being by Bury, for Bury.

By improving local insight, including through inclusive engagement, and the learning outlined in objective 6, this allows for a more equity-based approach to targeting public resources across the population in order to create the conditions where every person has access to the conditions to achieve their full potential.

Through the development of the neighbourhood model of delivery, inclusion is to be a key consideration in the development of community self-care and prevention approaches to support people to live and stay well within their communities.

7. Framework Delivery: Take action to adopt and ensure real progress is made on the on the Equality Framework for Local Government (EFLG), Equality Delivery System 2 (EDS2); Workforce Race Equality Standard (WRES) and Workforce Disability Equality Standard (WDES).

The Inclusion Strategy sets out to deliver improved awareness and assurance on compliance with legislation and policy frameworks in relation to equalities,

diversity and human rights. The strategy promotes the key components of the Equality Framework for Local Government and Equality Delivery System 2, the respective frameworks for assessing and improving inclusion for local authorities and CCGs respectively

The NHS Workforce Race Equality Standard (WRES) is a mandated requirement for CCGs (as well as NHS provider organisations) and was introduced because reports had highlighted disparities in the number of Black, Asian and Minority Ethnic (BAME) people in senior leadership positions, as well as lower levels of wellbeing amongst the BAME population. As such the WRES is a set of specific measures which enable NHS organisations to compare the workplace and career experiences of BAME and non-BAME staff, to develop a local action plan to demonstrate progress against indicators of race equality. The WRES has been included in the CCG main provider contracts. Going forward the Council will also adopt the WRES, thereby going beyond its legal requirement in order to make real progress towards creating a more representative workforce.

The NHS Workforce Disability Equality Standard (WDES) in part modelled on the WRES came into force in 2019 for providers. It is not a mandated requirement for CCGs, but both Bury Council and Bury CCG will adopt the WDES.

The overall approach to the development of this strategy goes beyond the law and regulation, allowing us to articulate what inclusion means for all our staff and communities; it aims to embed the inclusion objectives as our business as usual, it is not a bolt-on or nice-to-have.

4.2 Area of focus for 2021/22

The strategy is designed to further equality of opportunity across all protected characteristics equally. There will, however, be a particular characteristic agreed each year which will be as area of focus for the year ahead. The focus will be proposed by the staff-led Inclusion Working Group and approved by the Strategic Commissioning Board (SCB).

It is proposed to focus on addressing racism and inequality during 2021/22, on the basis of:

- The protests in the United States of America, this country and across the world following the killing of George Floyd in May 2020. The SCB resolved in June 2020 to be united in tackling racism and inequality and reaffirmed that, *"as an employer and service provider, Bury Council and NHS Bury CCG remain determined to oppose racist attitudes in everything we do"*.
- The Public Health England report *Disparities in the risk and outcomes of COVID-19* (June 2nd 2020) provided emerging evidence that black and minority ethnic (BAME) communities are disproportionately affected by COVID-19

A work plan for a particular focus on race equality over the next 12 months will be developed by the Inclusion Working Group, in consultation with community groups and presented to the SCB for approval.

5. Delivery Plan

Appended to this strategy is a delivery plan which sets out the work to pursue defined objectives. The delivery plan will be performance managed as a key aspect of the joint Corporate Plan which is approved by Bury Council and NHS Bury CCG Governing Body each year. Summary milestones are:

By the end of the 2020/2021 financial year:

- Investment made in additional leadership capacity to drive this agenda and post holder in place
- Equality assessment process updated and operating. Decisions will only be progressed if a robust assessment is in place
- Community engagement plan agreed and published, including plans for regular "listening events" with different community groups and action plans as a result
- A detailed plan will be developed for the focused work to tackle race inequality over the next 12 months

By Q2 2021/22

- Quarterly reports and scrutiny of progress towards inclusion objectives as part of wider corporate plan begin
- Clear plan for improving workforce and service user management information
- Workforce and Elected Member / Governing Body member learning and development offer updated
- HR policies reviewed and updated to reflect the ambition for greater representation
- Action plans for equality frameworks refreshed
- The ambition for improving workforce representation to be agreed and a plan to achieve it in place

By the end of the 2021/22 financial year:

- All staff training updated, with priority for those responsible for making Equality Assessments
- Meaningful progress being made towards equality frameworks

6. Governance

This is a joint strategy between Bury Council and Bury CCG and such ownership in terms of driving implementation and evaluation sits with the Strategic

Commissioning Board (SCB) under the accountable leads of:

- The CCG Chair as Clinical Lead for Inclusion
- The Council's Cabinet Member for Corporate Affairs

Reporting against the Implementation Plan will take monthly to the Cabinet Member for Corporate Affairs and the Clinical Lead for inclusion; who together shall present joint updates to SCB every six months and to the respective scrutiny committees (Bury Council – Overview and Scrutiny Committee). As outlined above reporting on progress and outcomes of the Inclusion Objectives will also take place through the quarterly reviews of the Corporate Plan by the SCB.

Regular updates will also be provided to the Bury Strategy Board, to share learning and opportunities to promote best practice across the wider Bury system.

A Workforce Inclusion Group, comprised of the Chairs/representatives of workforce equality groups, the Trade Unions and key heads of service, meets fortnightly to deliver the actions in this plan. Updates to the Council and CCG workforce are provided quarterly by this group through the Inclusion Matters staff newsletter.

Appendix 1: Joint Implementation Plan

RAG as at 17th November 2020

Recommendation	Requirement	CCG	Council	Status
Inclusion Objective 1 : Performance and Scrutiny :				
(a) ensure that there is a robust performance/scrutiny function in place for current and future Inclusion work				
(b) Establish effective governance arrangements				
(c) resource through internal staff expertise at a senior level and drive forward the implementation of the Inclusion Strategy				
Council 1	Establish an Inclusion Implementation Group, with an Executive Lead, membership to be determined by the Council, in order to implement the Inclusion Strategy and actions monitored across the organisation		✓	In progress
Council 1	Identify and establish reporting arrangements for the Inclusion Implementation Group	✓	✓	In progress
CCG 1	Establish an annual review process of the equality objectives and implementation plans actions and set appropriate objectives and actions for subsequent year	✓	✓	Complete
	Produce an annual report on progress made against objectives and actions	✓	✓	Complete
CCG 1	Remove the responsibility for the monitoring of EDHR work from the Quality and Performance Committee and establish a CCG Inclusion Implementation Group with an Executive Lead	✓		In progress
Council 3	Identify a named senior leader who will act as a Champion for the Equality Employee Groups		✓	In progress
Council 3	Establish a Head of Equality post		✓	In progress
CCG 1	Establish a junior internal EDHR post to operationalise delivery working across the CCG and the Council	✓		To be actioned
Inclusion Objective 2 : Equality Data and Information :				
(a) improve data collection with regard to the protected characteristics of employees and service users				
(b) ensure that the Council is meeting its legal obligations to have due regard to the general equality duty and to be able to demonstrate compliance				
(c) ensure that the CCG is meeting its legal obligations to have due regard to the general equality duty and to be able to demonstrate compliance				
Council 7	Carry out a full data cleanse of the iTrent (HR system) in order to take the initial step of improving data collection on the protected characteristics of employees		✓	In progress
Council 7	Introduce consistent data collection requirements across the protected characteristics for all departments and service areas		✓	In progress
Council 2 CCG 2	Design and implement a robust system across each department to confirm, QA & record EA screening of policies takes place	✓	✓	To be actioned

	Insert an EA section into formal reports in order to provide a written explanation of the outcome(s) of either conducting an initial or full EA	✓	✓	Complete
	Implement a robust system whereby approval of a formal report is paused when the 'Equality/Diversity implications' section is left blank and approval will only be given when this section is completed	✓	✓	In progress
	Identify all staff who are required to undertake EAs and implement a robust system to ensure these staff attend tutor-led EA training	✓	✓	To be actioned
	Establish a reporting mechanism of EA work conducted departmentally to the future Inclusion Implementation Group in order to monitor progress made and to establish an accountability and assurance function	✓	✓	To be actioned
	Update current EA Template and Guidance	✓	✓	In progress
CCG 2	Design and implement a central system to record EA work and their outcomes	✓		To be actioned
Inclusion Objective 3 : Community Engagement :				
(a) improve community engagement				
(b) Ensure members of local BAME Communities, through the 'Listening Exercise', to have been genuinely heard				
Council 6	Produce a Community Engagement Strategy co-designed with communities across the protected characteristics with a clear implementation plan		✓	In progress
Council 6	Introduce Regular Listening Events & reports back with members of communities with protected characteristics/community leaders/voluntary and community sector representatives		✓	In progress
CCG 5	Develop equality and health inequalities guidelines for commissioners embedding EDHR in strategies, commissioning intentions, policies, service specifications and service redesign	✓		In progress
CCG 5	Approve the draft Communications and Engagement Strategy 2020-2023 and take steps to implement the Strategy	✓		In progress
Council 8 CCG 10	Ensure the full findings of this exercise is shared with relevant key staff across departments	✓	✓	In progress
Council 8 CCG 10	Report on progress made against these actions to the Inclusion Implementation Group and to the people who participated in the Listening Exercise	✓	✓	In progress
Inclusion Objective 4 : Representative Workforce :				
(a) Progress development of a Council workforce that is representative of Bury's population				
(b) Continue to create a more representative CCG workforce by identifying positive action measures				
(c) implement the actions relating to staff contained in the 'Workforce section of the current (CCG) Annual Equality Publication				
(d) make real progress against the current WRES action plan				
Council 4	Open up vacancies for external recruitment		✓	To be actioned

	Where there is an under-representation of staff at all levels compared to the local population across the protected characteristics, identify positive action measures and take action to progress these, with a particular focus on Race in 2021 and a particular focus on Disability in 2022		✓	To be actioned
	Adopt the NHS Workforce Race Equality Standard (WRES) and produce a WRES Action Plan		✓	In progress
	Set workforce targets/aspirations, which are monitored across each department's performance against these targets		✓	To be actioned
Council 9 CCG 11	Adopt the NHS Workforce Disability Equality Standard (WDES) as part of their future objectives setting for 2022	✓	✓	To be actioned
CCG 11	Identify positive action measures and take action to progress these	✓		To be actioned
CCG 9	Ensure actions from workforce AEP are placed into an action plan with clear timescales	✓		In progress
CCG 8	Complete the examination of staff pay band data	✓		In progress
	Ensure recruitment panels are diverse and monitor regularly	✓		To be actioned
	Include on job advertisements a positive action statement	✓		In progress
	Assess how the CCG currently advertises posts and determine whether extra efforts to reach BAME communities is required	✓		In progress
	Agree incremental aspirational targets for the recruitment of BAME staff at senior levels and at Board level	✓		To be actioned
	Use recruitment agencies that specialise in diverse candidate attraction for posts at senior levels	✓		Complete
	Track and report applications, shortlisting, appointments, promotions and leavers by ethnicity	✓		Complete
	Develop a bank of recruitment champions who will provide checks on the recruitment process	✓		In progress
	Identify and agree further actions, where applicable, contained in the NHS Guidance – 'A Model Employer: Increasing BAME representation at senior levels across the NHS'	✓		To be actioned
Inclusion Objective 5 : Training and Learning				
(a) Upskill council staff and elected members and to enable them to effectively raise awareness and contribute to the implementation of the Inclusion Strategy				
(b) to upskill CCG staff with regard to EDHR and provide bespoke tailor-made tutor-led equality and diversity training				
Council 5	Provide tutor-led bespoke equality and diversity training and other learning opportunities to different cohorts within the Council. Take action to ensure		✓	To be actioned

	compliance			
Council 11 CCG 6	Replace the mandatory e-learning EDHR module with tutor-led bespoke EDHR training	✓	✓	To be actioned
CCG 6	Introduce Fair and Inclusive Recruitment and Selection training for staff involved in recruitment and selection	✓		In progress
CCG 6	Introduce tutor-led Human Rights Act training for relevant staff and managers	✓		To be actioned
Council 11 CCG 6	Design and implement a Diversity-Based Reverse Mentoring Programme	✓	✓	To be actioned
Inclusion Objective 6 : Improve user access and experience				
(a) CCG to assure itself that Providers are compliant with the EDHR contract requirements and to also help improve data collection on service users with protected characteristics				
(b) CCG to be assured of compliance against the Accessible Information Standard (AIS) and thereby improve patient access and experience				
(c) CCG to further demonstrate its commitment to ensuring that EDHR is at the heart of commissioning				
CCG 3	Approve the draft Contract Management Policy 2020-2023 and take steps to implement the policy including arrangement for monitoring and reporting provider compliance	✓		In progress
CCG 4	Assess the CCG's compliance with the AIS for the CCG's main public-facing services and raise staff awareness of its requirements	✓		In progress
CCG 4	Seek assurance from provider organisations of their compliance with the standard	✓		In progress
CCG 4	Assess GP practices' compliance with the AIS	✓		In progress
Inclusion Objective 7 : Framework Delivery				
(a) continually improve the Council's work on equality				
(b) progress against the goals in the EDS2				
Council 10	Determine which EFLG criteria/sub criterion is prioritised on a yearly basis		✓	To be actioned
CCG 7	make an assessment against the evidence collected for grading purposes for Goal 1: Better Health Outcomes	✓		In progress
CCG 7	Identify the next Goal in the EDS2 and use the EDS2 Guidance Steps as a framework for progressing actions	✓		In progress

Appendix 2: Bury's Demography: 190k people, 6 towns, 1 Borough.

The gender split within Bury is 51% female and 49% male. This is the same as the gender split for England and Wales (2011 Census).

Bury has an age profile which is relatively younger than England overall, with more people aged between 30-39, and 50-59 (2018 Office of National Statistics MidYear Estimates) By 2021 the number of people aged under 20 years old is expected to increase by 2%. The over 65-year-old population is expected to increase by 6%. The over 80-year-old population is expected to increase by 11%.

In terms of race, Bury has a Black, Asian and Minority Ethnic (BAME) population of around 10.8% compared to 14.7% of the population of England and Wales (2011 Census). The Borough has a number of emerging communities' and data from the Government shows that there are 495 refugee and asylum seekers in Bury receiving section 95 support intended to meet essential living needs. In the North West region, the nationalities of those seeking asylum are predominantly from Pakistan, Iran, Iraq and Nigeria.

Over 21,224 people in Bury have a limiting long-term illness, health problem or disability equating to 11.24% of our resident population, compared to 18.8% of the population of England and Wales (2011 Census). Instances of disability rise significantly with age. As life expectancy increases, the number of people with complex care needs rises too.

The number of people providing unpaid care is around 19,954, of which 2.5% care for 50 hours or more.

The majority of Bury's residents indicate they identify as Christian faith (62.7%), followed by Muslim (6.1%) and Jewish (around 5.6%). 18.6% identified as having no religion. This compares to the population of England and Wales as Christian (59.3%), followed by Muslim (4.8%), Hindu (1.5%), Sikh (0.8%) and then Jewish (0.5%). 25.1% identified as having no religion (2011 Census).

There is currently no national or local data on gender identity. However, estimates provided by the Lesbian, Gay, Bisexual and Transgender (LGBT) Foundation that 1 in 4,000 people in the UK seek support to change their birth gender.

There is currently no national or local data on sexual orientation. However, estimates provided by the LGBT Foundation and Stonewall that between 5% and 7% of the population identify as Lesbian, Gay or Bisexual nationally

The Census 2011 showed those married as 70,088 and those in a registered same-sex civil partnership status as 253 in Bury.

Annex A

EQUALITY ANALYSIS

This Equality Analysis considers the effect of Bury Council/ Bury CCG activity on different groups protected from discrimination under the Equality Act 2010. This is to consider if there are any unintended consequences for some groups from key changes made by a public body and their contractor partners organisations and to consider if the activity will be fully effective for all protected groups. It involves using equality information and the results of engagement with protected groups and others, to manage risk and to understand the actual or potential effect of activity, including any adverse impacts on those affected by the change under consideration.

SECTION 1 – RESPONSIBILITY AND ACCOUNTABILITY	
<i>Refer to Equality Analysis guidance page 4</i>	
1.1 Name of policy/ project/ decision	Bury Council & CCG Inclusion Strategy
1.2 Lead for policy/ project/ decision	Lynne Ridsdale, DCE
1.3 Committee/Board signing off policy/ project/ decision	Cabinet/ Governing Body
1.4 Author of Equality Analysis	<i>Name: Lynne Ridsdale</i> <i>Role: Deputy Chief Executive</i> <i>Contact details: l.ridsdale@bury.gov.uk</i>
1.5 Date EA completed	14th December 2020
1.6 Quality Assurance	<i>Name: Lisa Featherstone</i> <i>Role: Deputy Director</i> <i>Contact details: lisa.featherstone@nhs.net</i> Comments: The EA of the Inclusion Strategy reflects that the requirements of the PSED and Equality Act have been fully considered
1.7 Date QA completed	13/01/2021
1.8 Departmental recording	<i>Reference: CC001 – Inclusion Strategy</i> <i>Date: 13/01/2021</i>
1.9 Next review date	31/03/2021

SECTION 2 – AIMS AND OUTCOMES OF POLICY / PROJECT	
<i>Refer to Equality Analysis guidance page 5</i>	
2.1 Detail of policy/ decision being sought	Approval of Bury inclusion strategy including equalities objectives for next 4 years
2.2 What are the intended outcomes of this?	Compliance with Equality Act duties; progression towards Bury 2030 “inclusion” pledge delivery; demonstrable progress against equalities frameworks e.g. Equalities Framework for Local Government & Workforce Race & Disability Equality Framework

SECTION 3 – ESTABLISHING RELEVANCE TO EQUALITY & HUMAN RIGHTS

Refer to Equality Analysis guidance pages 5-8 and 11

Please outline the relevance of the activity/ policy to the Public Sector Equality Duty

General Public Sector Equality Duties	Relevance (Yes/No)	Rationale behind relevance decision
3.1 To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by Equality Act 2010	Yes	Action plan to improve internal compliance with Equalities Act and relevant best practice standards
3.2 To advance equality of opportunity between people who share a protected characteristic and those who do not.	Yes	Action plan to ensure the council and CCG have a plan to make a meaningful contribution to Bury 2030 inclusion pledge
3.3 To foster good relations between people who share a protected characteristic and those who do not	Yes	Action plan to ensure the council and CCG have a plan to make a meaningful contribution to Bury 2030 inclusion pledge
3.4 Please outline the considerations taken, including any mitigations, to ensure activity is not detrimental to the Human Rights of any individual affected by the decision being sought.		
The Inclusion Strategy includes direct reference to the promotion of Human Rights; indeed, the term inclusion has been utilised to demonstrate this strategy is beyond equality to include diversity and human rights.		

SECTION 4 – EQUALITIES DATA

Refer to Equality Analysis guidance page 8

Protected characteristic	Outcome sought	Base data	Data gaps (to include in Section 8 log)
4.1 Age	Progression of the 7 inclusion objectives with regards each characteristic / Community of interest: <ul style="list-style-type: none"> Performance and Scrutiny: Equality Data and Information: Community Engagement Representative Workforce Training and Learning 	See Appendix	-
4.2 Disability			-
4.3 Gender			-
4.4 Pregnancy or Maternity			-
4.5 Race			Limited information on smaller and emerging communities in Bury
4.6 Religion and belief			-
4.7 Sexual Orientation			-
4.8 Marriage or Civil Partnership			-
4.9 Gender Reassignment		None	There is currently no national or local

	<ul style="list-style-type: none"> Improve patient access and patient experience: NHS Frameworks Delivery 		data on gender identity
4.10 Carers		19,954 (Census 2011)	
4.11 Looked After Children and Care Leavers		358 Looked After Children and 140 Care Leavers	
4.12 Armed Forces personnel including veterans		6,447 (GP register, July 2020)	Specific question being asked in 2021 census
4.13 Socio-economically vulnerable		<ul style="list-style-type: none"> 15,700 Housing benefit / Council Tax support claimants NOMIS Claimant Count: <ul style="list-style-type: none"> 8,135 (October 2020) 17,207 household members in STH properties 356 people whom the council has a homeless duty 34 rough sleepers currently in temporary accommodation, including A Bed Every Night 	Data to continue to be updated from Bury Community Support Fund measures.

SECTION 5 – STAKEHOLDERS AND ENGAGEMENT

Refer to Equality Analysis guidance page 8 and 9

	Internal Stakeholders	External Stakeholders
5.1 Identify stakeholders	All council and CCG staff	All Borough residents The Team Bury partnership network
5.2 Engagement undertaken	<ul style="list-style-type: none"> All staff invited to contribute to the Bury 2030 vision 121 interviews with a sample of staff, Equality Group Chairs and leaders by independent consultant Bury 2030 consultation began 2 November 2020 and ongoing Strategic Commissioning Board on 7th December 2020 	<ul style="list-style-type: none"> Borough-wide survey on Bury 2030 vision via One Community Partnership events including the Faith Forum; Jewish Leaders' meetings and Partnership-wide away days Specific Listening Event with BAME community leaders

		<ul style="list-style-type: none"> Bury 2030 consultation began 2 November 2020 and ongoing
5.3 Outcomes of engagement	Key messages captured in consultant feedback and independent report. Council and CCG found to be equally poor as organisations in meeting equalities obligations in law and fulfilling own ambition	
5.4 Outstanding actions following engagement (include in Section 8 log)	None outstanding for approval of report	None outstanding for approval of report

SECTION 6 – CONCLUSION OF IMPACT

Refer to Equality Analysis guidance page 9

Please outline whether the activity/ policy has a positive or negative effect on any groups of people with protected inclusion characteristics

Protected Characteristic	Positive/ Neutral Negative /	Impact (include reference to data/ engagement)
6.1 Age	Positive	Given nature of strategy, see 6.14
6.2 Disability	Positive	
6.3 Gender	Positive	
6.4 Pregnancy or Maternity	Positive	
6.5 Race	Positive	
6.6 Religion and belief	Positive	
6.7 Sexual Orientation	Positive	
6.8 Marriage or Civil Partnership	Positive	
6.9 Gender Reassignment	Positive	
6.10 Carers	Positive	
6.11 Looked After Children and Care Leavers	Positive	
6.12 Armed Forces personnel including veterans	Positive	
6.13 Socio-economically vulnerable	Positive	
6.14 Overall impact - What will the likely overall effect of your activity be on equality, including consideration	Strategy provides framework to ensure positive contribution against all characteristics / communities of interest with clear action plan for delivery against: <ul style="list-style-type: none"> The requirements of the Equalities Act 2010 	

on intersectionality?	<ul style="list-style-type: none"> Internal ambition as described in the Inclusion Strategy and joint Corporate Plan
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SECTION 7 – ACTION LOG			
<i>Refer to Equality Analysis guidance page 10</i>			
Action Identified	Lead	Due Date	Comments and Sign off (when complete)
7.1 Actions to address gaps identified in section 4			
Data to be sought on carers	CW	17/12/20	Received 16/12/2020 and included in section 4
Data to be sought on Armed Forces	CW	17/12/20	Received 16/12/2020 and included in section 4
Data to be sought on socio-economically vulnerable	CW	17/12/20	Requested 14/12/20 and included in section 4. Further data from Bury Community Support Fund to be routinely added.
7.2 Actions to address gaps identified in section 5			
No gaps at present			
7.3 Mitigations to address negative impacts identified in section 6			
No gaps at present			
7.4 Opportunities to further inclusion (equality, diversity and human rights) including to advance opportunities and engagements across protected characteristics			
The “inclusion” pledge applies as one of the five cross-cutting outcomes for the whole Bury 2030 vision. Every initiative and deliverable will be tested to ensure it is contributing to inclusion and other pledges, to ensure all resources are aligned to the strategic vision	All	Ongoing	

SECTION 8 - REVIEW			
<i>Refer to Equality Analysis guidance page 10</i>			
Review Milestone	Lead	Due Date	Comments (and sign off when complete)
Prior to Cabinet meeting January 2021	LR	08/01/2021	EA reviewed 13/01/2021
Ahead of reporting against implementation plan to Cabinet Member for Corporate Affairs and Clinical Lead for Inclusion	LR	Monthly	Monthly reports will be prepared against delivery of the Inclusion Action Plan and learnings will be reflected into the EA accordingly.

Ahead of progress and outcomes of Inclusion Strategy as part of quarterly reviews of Corporate Plan to SCB	LF	Quarterly	Overarching Inclusion objectives will be monitored as part of quarterly corporate plan reports and learnings will be reflected into the EA accordingly.
Ahead of Joint update to Strategic Commissioning Board	Cllr Tahir Rafiq/ Dr. Jeff Schryer	Every six months	Updates to SCB will reflect on overarching Inclusion Objectives and inclusion Action Plan learnings and learnings will be reflected into the EA accordingly.
Ahead of reporting to respective Scrutiny functions	LR	At least annually	Learnings will be included within the Annual Equality Publication / Equality Annual Report and learnings will be reflected into the EA accordingly.

SECTION 9 – QUALITY ASSURANCE		
<i>Refer to Equality Analysis guidance page x</i>		
Consideration	Yes/No	Rationale and details of further actions required
Have all section been completed fully?	Yes	All sections have been populated
Has the duty to eliminate unlawful discrimination, harassment, victimization and other conducted prohibited by the PSED and Equalities Act been considered and acted upon?	Yes	The inclusion strategy sets at its core the requirement to deliver through all activity compliance with the PSED and Equalities Act.
Has the duty to advance equality of opportunity between people who share a protected characteristic and those who do not been considered and acted upon	Yes	The inclusion strategy sets at its core the requirement to deliver through all activity compliance with the PSED and Equalities Act.
Has the duty to foster good relations between people who share a protected characteristic and those who do not, been consider and acted upon	Yes	The inclusion strategy sets at its core the requirement to deliver through all activity compliance with the PSED and Equalities Act.
Has the action log fully detailed any required activity to address gaps in data, insight and/or engagement in relation to inclusion impact?	Yes	The actions to address the data gaps have been completed
Have clear and robust reviewing arrangements been set out?	Yes	The Strategy and EA will be reviewed regularly through routine reporting of progress against objectives and action plan with learnings used

		to inform changes and improvements accordingly
Are there any further comments to be made in relation to this EA	No	

Appendix : Bury 2030 Strategy - Bury's Diversity

Bury has a resident population of 190,108. The communities we serve are diverse in their make-up. We have several indicators of our population's diversity across the protected characteristics:

Gender

The gender split within Bury is 51% female and 49% male. This is the same as the gender split for England and Wales (2011 Census).

Age

Bury has a relatively younger population profile, similar to England overall, with more people aged between 30-39, and 50-59 (2018 Office of National Statistics Mid-Year Estimates) By 2021 the number of people aged under 20 years old is expected to increase by 2%. The over 65-year-old population is expected to increase by 6%. The over 80-year-old population is expected to increase by 11%.

Race

Bury has a Black, Asian and Minority Ethnic (BAME) population of around 10.8% compared to 14.7% of the population of England and Wales (2011 Census). The Borough has a number of emerging communities' and data from the Government shows that there are 495 refugee and asylum seekers in Bury receiving section 95 support intended to meet essential living needs. In the North West region, the nationalities of those seeking asylum are predominantly from Pakistan, Iran, Iraq and Nigeria.

Disability

Over 21,224 people in Bury have a limiting long-term illness, health problem or disability equating to 11.24% of our resident population, compared to 18.8% of the population of England and Wales (2011 Census). Instances of disability rise significantly with age. As life expectancy increases, the number of people with complex care needs rises too. The number of people providing unpaid care is around 19,954, of which 2.5% care for 50 hours or more.

Religion/Belief (and Lack of Religion/Belief)

A majority of Bury's residents are Christian (62.7%), followed by Muslim (6.1%) and Jewish (around 5.6%). 18.6% identified as having no religion. This compares to the population of England and Wales as Christian (59.3%), followed by Muslim (4.8%), Hindu (1.5%), Sikh (0.8%) and then Jewish (0.5%). 25.1% identified as having no religion (2011 Census).

Gender Reassignment

There is currently no national or local data on gender identity. However, estimates provided by the Lesbian, Gay, Bisexual and Transgender (LGBT) Foundation that 1 in 4,000 people in the UK seek support to change their birth gender.

Sexual Orientation

There is currently no national or local data on sexual orientation. However, estimates provided by the LGBT Foundation and Stonewall that between 5% and 7% of the population identify as Lesbian, Gay or Bisexual nationally.

Marriage and Civil Partnership

The Census 2011 showed those married as 70,088 and those in a registered same-sex civil partnership status as 253 in Bury.