



Croydon Clinical Commissioning Group
Public Sector Equality Duty
Annual Report
April 2013 - January 2014

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Welcome

We are delighted to present this report highlighting our progress on equalities in 2013.

This year has been one of significant change in the NHS, and we are keen to ensure that we understand and implement the statutory requirements we are responsible for as a public body, an employer and a commissioner of services.

This report brings together information, evidence and recommendations which demonstrates how NHS Croydon Clinical Commissioning Group (CCCG), is already meeting statutory duties under the Equality Act 2010. However, as a relatively new organisation we acknowledge that we still have more to do to continue to integrate human rights, equality and diversity into the way we commission health services for the people of Croydon.

There is clear demonstration of the steps already taken to improve performance in the area of equality, and CCCG are committed to building on successes and addressing gaps, in recognition that:

- People can experience inequalities, discrimination, harassment and other barriers;
- Patients should be at the centre of our decision making, and in partnership we can deliver high quality, accessible services that tackle inequalities and respond to personal needs;
- An environment where dignity, tolerance and mutual respect is experienced by patients, staff and members should be created and maintained.

The contents covered describe how key business functions have taken into account equalities requirements, evidenced by relevant documentation and supporting information where required. Key areas for development and recommendations are cited at the close of this report by way of our Equality Objectives Action Plan.

We have already commenced work on delivering the goals of the action plan.

Dr Tony Brzezicki

Clinical Chair
Croydon Clinical Commissioning Group

Acknowledgement: Thanks go to all colleagues from Croydon Clinical Commissioning Group and South London Commissioning Support Unit who contributed to this report.

1 Introduction

1.1 Background

The Equality Act 2010 provides a legal framework to strengthen and advance equality and human rights. The Act consists of general and specific duties:

The general duty requires public bodies to show due regard to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

There are nine 'protected characteristics' covered by the Equality Act: race, disability, sex (male/female), age, religion or belief, sexual orientation and gender reassignment, marriage and civil partnership and pregnancy and maternity.

The specific duties require public bodies to publish relevant, proportionate information showing how they meet the Equality Duty by 31 January each year, and to set specific measurable equality objectives by 6 April every four years starting in 2012. Both general and specific duties are known as the Public Sector Equality Duties (PSED).

As a statutory public body, the NHS Croydon Clinical Commissioning Group must ensure it meets these legal obligations and intends to do so by publishing information demonstrating how the organisation has used the Equality Duty as part of the process of decision making in the following areas:

- Service delivery - evidence of equality impact analysis that has been undertaken
- Information - details of information taken into account when assessing impact
- Consultation - details of engagement activity that has taken place

With the introduction of the Equality Act 2010, Equality Impact Assessments have been abolished. A new tool has been developed and adopted to assess the impact of documents and services known as 'Equality Analysis'.

1.2 Organisational context

Croydon Clinical Commissioning Groups (CCG) assumed statutory responsibilities from 1 April 2013.

GPs in Croydon have come together as the Croydon Clinical Commissioning Group. Croydon CCG is responsible for assessing the healthcare needs for the population of Croydon and co-ordinating and paying for services to meet those needs through hospital, community and mental health services. As a membership organisation, our GP member practices work in 6 GP networks, to address problems that are arising, and to see how local services can be improved and better co-ordinated. Croydon CCG's constitution commits the organisation to work towards meeting the public sector equality duties and reduce health inequalities.

We recognise that, as commissioners of services, we must account for not only our own organisational equality performance but also that of the providers of services that we commission.

The CCG is purchasing a range of services from the South London Commissioning Support Unit (including Equality and Diversity service), which supports the CCG to discharge its statutory responsibilities, including those within the Equality Act 2010.

NHS England provides strategic policy guidance and performance monitoring through its national Equality and Health Inequalities team.

This report will focus on the period April 2013 – January 2014, covering the following core business areas:

- Commissioning Plans
- Quality Innovation Productivity and Prevention (QIPP)
- Partnerships
- Patient and Public Engagement
- Commissioned Services
- Contracts, Tenders and Performance Monitoring
- Serious Incidents
- Safeguarding
- Complaints / Patient Advice and Liaison Service (PALS)
- Summary of Equality and Diversity progress in 2013/14

1.3 CCG Leadership

Croydon CCG has identified a clinical equality lead that is actively supporting the development and delivery of equality work streams.

All Governing Body members have a collective and individual responsibility to ensure compliance with the public sector equality duty, which will in turn secure the delivery of successful equality outcomes for us, both as a commissioner and an employer.

The Governing Body provides strategic leadership to the equality and diversity agenda, which is in part achieved by establishing and embedding the Equality and Diversity Strategy, and also by:

- Agreeing the organisation's objectives for improving its equality performance
- Ensuring that equality is a core consideration in Governing Body discussions and decisions
- Leading by example by actively championing the equality and diversity agenda and attending staff forums and meetings of patient and community groups

A **Lay Member** has been appointed to the CCG's Governing Body to lead on patient and public involvement. The Lay Member has oversight responsibility for ensuring that the voice of the local population is heard in all aspects of the CCG's business, and that equal opportunities are created and protected for patient and public involvement and engagement.

The **Chief Officer** has responsibility for ensuring that the necessary resources are available to progress the equality and diversity agenda within the organisation and for ensuring that the requirements of this framework are consistently applied, co-ordinated and monitored.

The **Director of Governance and Quality** has operational responsibility for:

- Developing and monitoring the implementation of robust working practices that ensure that equality and diversity requirements form an integral part of the commissioning cycle
- Working with the South London Commissioning Support Unit (SLCSU) to ensure that equality and diversity considerations are embedded within their working practices
- Ensuring that the Governing Body, staff and member practices remain up to date with the latest thinking around diversity management and have access to appropriate resources, advice, and informal and formal training opportunities

All **line managers** have responsibility for:

- Ensuring that employees have equal access to relevant and appropriate promotion and training opportunities.
- Highlighting any staff training needs arising from the requirements of this framework and associated policies and procedures.
- Support their staff to work in culturally competent ways within a work environment free from discrimination

2. Croydon Clinical Commissioning Group Commissioning Plans

2.1 Commissioning Plans / Integrated Operating Plan

When making decisions about the services to be commissioned Croydon CCG ensures that equality and diversity intelligence informs its decisions by routinely using the Joint Strategic Needs Assessment (JSNA) and by carrying out Equality Analysis. Croydon CCG has prepared commissioning plans which look carefully at population needs based on demographics, health inequalities and access to services. At the heart of these strategies is a key objective to reduce health inequalities, improve outcomes for patients ensuring services are accessible and responsive to patients.

Since April 2013 Croydon CCG has worked in partnership with the Croydon Health and Wellbeing Board to align its priorities and its vision of 'Longer, Healthier Lives for all the People in Croydon'. This work produced "A Clear and Credible Plan 2013/14 for Commissioning Sustainable Health Services for Croydon's Population" that is an Integrated Strategic Operating Plan.

Croydon CCG's Integrated Strategic Operating Plan (ISOP) for 2013/14 includes redesigning the pathways for several long term conditions including cardiovascular disease, dementia and respiratory diseases. All of these diseases and conditions have a significant impact upon people who share a protected characteristics and those who do not.

2.2 Joint Strategic Needs Assessments

The purpose of JSNAs is to improve the health and wellbeing of the local community and reduce inequalities. JSNAs assess the current and future health and social care needs of the local community. These are needs that could be met by the local authority, Clinical Commissioning Groups (CCGs), the wider NHS or the voluntary and community sector. This analysis of needs is used to help to determine what actions local authorities,

the local NHS and other partners need to take to meet health and social care needs, and to address the wider determinants that impact on health and wellbeing.

The Croydon JSNA combines a key dataset, which shows how Croydon compares with London and England across a wide range of indicators related to health and wellbeing, with a small number of chapters on key topic areas

The Croydon Key Dataset brings together comparative data for a wealth of indicators of relevance to health and wellbeing. This year, over 200 indicators have been included, grouped into the following headings:

- Deprivation
- Later life
- Community life
- Healthy life:
- Early life
- Long term conditions
- Family life
- Healthy lifestyles
- Working age
- Health services

The Key Dataset is part of Croydon's annual approach to Joint Strategic Needs Assessment (JSNA). The full 2013/14 JSNA, including four key topic chapters on homelessness, domestic violence, alcohol, and obesity and physical activity can be found at <http://www.croydonobservatory.org/jsna/>.

This data, along with feedback from clinicians and the public, has helped CCG to develop its commissioning intentions for 2014/15

2.3 Croydon CCG Commissioning Intentions 2014/15

NHS Croydon CCG faces significant challenges including an ageing population, rising demand for services and high public expectations of those services.

In addition to this Croydon Clinical Commissioning Group also faces significant financial challenges during 2014/15 and in future years with the consequence that funding will not be able to match the increasing demand for NHS services.

Croydon CCG will commission health services for its population, based on patient need, current performance, the Integrated Strategic Operational Plan for 2013/14 and the current definition of CCG commissioning responsibilities.

The Commissioning Intentions should be read in the context of the 'Better Services, Better Value' Out of Hospital Strategy and the London Standards that recognises that that services will no longer be focused on secondary sector acute provision, instead the whole health economy.

The improvements set out in the Commissioning Intentions (please see Appendix 1) are key enablers to us meeting our planned reduction in non-elective admissions over the next 5 years. In 2014-15 in this context the CCG will be developing 'outcome based commissioning' and the contractual mechanisms related to this form of contracting.

2.4 Transformational Commissioning

Our three main challenges are;

- Our demography
- High Public Expectations
- Financial Constraints.

In order to tackle these constraints in a focused, joined up and achievable way, our improvements will be realised through whole system transformation. The Transformation Programme, in addition to improving quality outcomes, aims to release efficiencies and reduce an over reliance on hospital services. We have worked with the Better Services, Better Value principles and reviewed our targets to stretch the reduction in hospital activity through our transformation programme.

To ensure that there is choice available in settings other than hospital we aim to transform the way we deliver services at the intermediate, primary and community level. There are several strategies which are part of the wider transformation programme:

- Prevention, Self-Care and Shared Decision Making Strategy
- Primary and Community Strategy
- Long-term conditions
- Urgent Care
- Making best use of medicines
- Planned Care
- Children and Young people

2.5 Quality Innovation Productivity and Prevention (QIPP) programme

QIPP is a national programme for the NHS aiming to make efficiency savings while delivering Quality, Innovation, Productivity and Prevention outcomes.

The general equality recommendation across all work streams is that each project undergo an Equality Analysis screening assessment, with a full Equality Analysis undertaken where indicated.

The main objective of Croydon CCG is to improve the quality of healthcare commissioned and provided for the population of Croydon. There is a Quality, Improvement, Productivity and Prevention (QIPP) programme running which has 6 significant or “high impact” areas of service transformation.

The key initiatives are:

- Unplanned care QIPP scheme – reducing attendances and admissions to secondary care
- Planned Care – delivering care closer to home
- Mental Health – improving access to appropriate services (including the dementia programme)
- Medicines Management – improving patient outcomes and productive prescribing
- End of Life Care – improving patient choice and dignity
- Long term conditions –improved support to patients with long term illness

3 Partnerships

As a commissioning organisation it is vital for Croydon CCG to work closely with other local commissioners, monitors, evaluators and enforcers. We have spent time developing local relationships to ensure that we do not duplicate work, that the needs of all patients are known and provided for and that there is a good “strategic fit” to our work.

3.1 Integrated Commissioning Unit with Croydon CCG and Croydon Council Commissioners

Croydon Clinical Commissioning Group and the London Borough of Croydon have established an Integrated Commissioning Unit that plans together as relevant, to meet the needs of the populations and through the Health and Social Care portal will together monitor progress against expected outputs and outcomes.

The Integrated Commissioning Unit will progress jointly agreed initiatives, including, for example:

- Children and young people
- Transformational Strategy for Long Term Conditions / Older Frail People
- Mental health

The CCG and the Council have developed joint commissioning intentions that will focus on:

- **Transformation / Community Services** – out of hospital care, commissioning wide-range of community-based services to reduce the need for unplanned hospital activity/admissions
- **Urgent Care** – demand and capacity whole across the whole system
- **Effective Transition** – Children’s to Adult services
- **Rebalancing Mental Health Acute and Community Services**
- **Enhancing Mental Health Care in Primary Care**
- **Improved capacity in Psychological Therapies** in primary and secondary care
- **Re-commission Mental Health Older Adults and Dementia services**
- Have in place **requirements and actions from Winterbourne View Concordat.**

A copy of the Joint Commissioning Intentions can be found at Appendix 2.

3.2 Public Health

From April 2013, the London Borough of Croydon became responsible for commissioning most public health services.

Croydon CCG works collaboratively with the public health commissioners in Croydon Council to deliver joint priorities as set out in the health and wellbeing strategy and ensure the best health outcomes for local people.

This includes working together to:

- Reduce the prevalence of smoking through primary prevention focused on schools and youth settings, enforcing tobacco control measures, and providing a range of services to help people quit
- Tackle overweight and obesity through promoting physical activity and a healthy diet across the life course and ensuring that appropriate weight management and treatment services for obesity are in place
- Improve sexual and reproductive health by provision of advice, prevention and promotion, testing and treatment (including promotion of opportunistic testing and treatment in healthcare settings), and provision of high quality termination of pregnancy services.

The council is also responsible for commissioning adults' and children's social care services.

3.3 Health and Wellbeing Boards

Croydon Health and Wellbeing Board (HWBB), is a partnership of local councillors, officers of the council, CCG clinicians and executive managers, public health consultants, Croydon HealthWatch and representatives from the voluntary sector.

The Joint Health and Wellbeing Strategy 2013 - 2018 sets out 3 strategic goals;

- increased healthy life expectancy and reduced differences in life expectancy between communities
- increased resilience and independence
- a positive experience of care

3.4 Community, Voluntary and Faith Sector Organisations (including Carers support)

Croydon CCG is developing relationships with Croydon's many local support groups. Croydon CCG's clinicians are keen to work more closely with the voluntary sector and community groups and are currently exploring different models to support Social prescribing.

Social prescribing or 'community referral' is a means of enabling primary care services to refer patients with social, emotional or practical needs to a range of local, non-clinical services. Often these services are provided by voluntary, community and faith sector (VCFS) organisations.

The Public and Patients Inclusion Team have been exploring new avenues to engage with people:

- Development of engagement database
- Development of a People Bank
- Improving inclusive/diversity of engagement.
- Meeting with community groups to explore most effective ways to engage with them specifically

3.5 Croydon Healthwatch

Croydon Healthwatch was officially launched on 28th November 2013. Croydon Healthwatch is the independent champion of local people working to improve health and social care services. Croydon Healthwatch:

- wants everyone in Croydon to have the best local care and listens to patients, service users, carers and staff to gather their views and experiences of local health and social care services.
- uses those views to report on what services are doing well and if needed make recommendations on how they can be improved.
- works with people who plan and run services so that local voices are part of decision making.
- provides Croydon residents with information and signposting about their choices and what to do when things go wrong.

Croydon Healthwatch has the power to enter and view health and social care services across Croydon as well as produce reports and recommendations to influence the way services are designed and delivered.

3.6 Safeguarding - Croydon Safeguarding Adults and Children

The CCG is committed in taking all reasonable steps to promote safe practice and to protect children and adults at risk within Croydon from harm, abuse and exploitation. It recognises the strength in working collaboratively to address this safeguarding agenda with our providers and in partnership with our Local Authority & Croydon Safeguarding Children and Adult Boards. THE Chief Nurse is a member of both these Boards. The CCG's Safeguarding strategy sets out how Croydon CCG will work with others to safeguard and promote the welfare of children and adults at risk of harm.

Safeguarding is everyone's responsibility, therefore Croydon CCG's responsibility is to ensure that its staff, providers and contractors are aware and understand their responsibilities to safeguard and promote the welfare of children and vulnerable adults. These responsibilities take effect during the course of their employment/providing services and if they have direct or indirect contact with children and families and vulnerable adults, or who have access to information about them

There is a duty on organisations to make appropriate arrangements to safeguard and promote the welfare of children and vulnerable adults. Also government guidance makes it clear that it is a shared responsibility, and depends upon effective joint working between agencies and professionals that have different roles and expertise.

The Safeguarding Team sits within Croydon CCG. It provides services which exclusively focus on the needs of children and young people under the age of 18 years and a service for vulnerable adults.

The team works closely with partners across the health economy and the local authority. This includes the Croydon Safeguarding Children Board and the Safeguarding Adults Board.

The Croydon Safeguarding Adults Board makes strategy decisions in response to national and local policy developments, suggestions and any problem issues that arise. It ratifies terms of reference and work plans for its sub groups, endorses work carried out by them, and oversees the implementation of subsequent developments. Croydon CCG is represented on the CSAB.

The Croydon Safeguarding Children Board (CSCB) is a statutory multi-agency organisation that brings together local agencies that work to safeguard and promote the

welfare of children and young people up to the age of eighteen in Croydon. The Board meets regularly throughout the year to discuss a wide range of issues.

The CSCB is designed to help ensure that children are safeguarded properly by agencies working effectively together. Membership includes senior representatives from Croydon Council, all Croydon health bodies, Croydon Metropolitan Police teams, schools and voluntary organisations. Croydon CCG is represented on the CSCB.

4 Procurement and Commissioning

Procurement and commissioning form our core functions with respect to:

- Hospitals
- Community services
- Mental Health
- Ambulance
- Medicines Management
- Voluntary sector

In order to have due regard to equality impacts in our procurement and commissioning we make use of our equality analysis at the time we make decisions. This is especially important with respect to Any Qualified Provider (AQP). The CCG cannot delegate its responsibilities and duties for equality but where another provider is being procured or commissioned to deliver services on behalf of the CCG they will be required to comply with the relevant equality duties. If such a provider is already subject to the Public Sector Equality Duties (PSED) the CCG will seek evidence of their fulfilment of the Duty as part of its assessment of their procurement.

The Department of Health national contract is routinely used by Croydon CCG. This follows a review of contracts which showed wide variation in use of contract templates. The national contract includes provider requirements around 'equity of access, equality and no discrimination' and 'pastoral, spiritual and cultural care. Further evidence will need to be gathered to demonstrate how providers meet these requirements.

5 Mental Health - Reviewing Mental Health Services in Croydon

The JSNA for 2012/13 focused entirely on mental health. This is because of the high demand that was demonstrated by stakeholders across Croydon for in depth consideration of specific mental health issues.

In 2013 NHS Croydon CCG and Croydon Council commissioned The Croydon Mental Health Value for Money Review. The Review was prepared by Mental Health Strategies who were commissioned to identify savings in the respective mental health budgets of the CCG and the Council.

A number of reports, including the 12/13 JSNA, and the Value for Money Review have identified/confirmed differing service experiences by local residents with protected characteristics, including, for example, low rates of early diagnosis of dementia, depression and anxiety among some Black and Minority Ethnic populations, high

psychiatric inpatient admission rates among Black populations, and low rates of employment among those diagnosed with schizophrenia.

The commissioning team will work with partners throughout 2013/2014 to address these inequalities through a new mental health strategy, which will be put into action from April 2014. A key output from the strategy will be to reduce reliance on secondary services provided by statutory providers with a view to introducing greater flexibility and choice of service through a diverse range of providers, including voluntary sector organisations.

6 Transforming Adult Community Services – Older People and Long Term Conditions

Transforming Adult Community Services' will support increasing numbers of adults with complex needs in the community, particularly the elderly, helping them to live independently. Community staff from Croydon Health Services will be working with social care staff from Croydon Council to run services designed to consider every aspect of a patient's health, mental health and social care needs, assessing all available care options early on to ensure people remain healthy and avoid unnecessary hospital stays.

After listening to what Croydon's Older People were saying the service was designed by clinicians from both Croydon Health Services NHS Trust and Croydon CCG. It was developed from the work of the Croydon Strategic Transformation Board, which is made up of health and social care organisations, Croydon Council and voluntary sector representatives.

There are 3 Core Principles for Croydon:

- Principle 1: Rapid Response, integrated services
- Principle 2: Proactive joint planning and care
- Principle 3: Best quality, safe care at home or in the Community

The service has been designed by clinicians from Croydon Health Services NHS Trust and Croydon CCG who will work in partnership to achieve truly integrated care. The 'Single Point of Assessment' is a 'one stop shop' where GPs, hospital staff and other clinical practitioners can phone an experienced community nurse 24 hours a day, 7 days a week, to get expert advice on the different health and social care services available.

The main focus of the service is to support adults with complex needs, particularly the elderly, helping them to live independently in the community and lessening the need to spend time in hospital.

The Rapid Response Service has already started in parts of Croydon and the Cardiology pathway improvement and service design is being piloted in Thornton Heath.

7 Learning Disabilities

The commissioning of health services for people with Learning Disabilities is acknowledged as an important factor for the CCG. Supporting mainstream health services to ensure the delivery of good quality general health care for people with learning disabilities is embedded into practice.

This has been achieved as a result of resourcing specialist staff (Learning Disability nurses/Allied Health Professionals) with the explicit role to liaise with, train and support the primary care and acute sector to better meet the healthcare needs of people with Learning Disabilities. There is focused attention to support primary care in the provision of effective support systems. This is particularly important in supporting the delivery of comprehensive annual health checks for people with Learning Disabilities.

The CCG acknowledges the need to support those with a Learning Disability to access services within the acute hospital, the funding of an 'acute liaison nurse' has resulted in improvements in the quality and delivery of services and the patient experience.

There is an effective and identifiable strategic presence within the CCG to inform and support the commissioning and delivery of accessible, high quality health care for people with Learning Disability. Croydon has in place a Joint Commissioner who ensures that there is leadership in promoting health facilitation and health action planning for people with Learning Disabilities.

Commissioned services have inbuilt requirements to ensure the emotional and physical wellbeing of people with a Learning Disability are met:

- Specialist learning disability staff that both support mainstream practice and directly serve those with the most complex needs
- Specialist learning disability health services that promote safe, person-centred support and evidence based practice.
- Integrated planning and the development of care pathways that promote individualised services that are closer to home.
- Support to people and families when needed through swift access to the services of specialist professionals including medical, nursing and allied health professionals.
- Investment in training and development provided to specialist professionals; families and for front line support staff to enable them to better support people where they live.
- Ensuring that the 'voice' of people and families is heard and there is evidence of appropriate representation, including independent advocacy.

8 Patient and Public Engagement

Legal Duties -Section 242 of the NHS Act 2006, places a statutory duty on NHS organisations to involve and consult patients and the public in the planning of service provision, the development of proposals for change and decisions about how services operate. Section 24A of the NHS Act 2006 places a statutory duty on NHS organisations to report on consultations and the influence on commissioning decisions.

Patient Engagement and Experience is reported quarterly to the Governing Body via the Quality Sub Committee. We aim to continually improve the ways in which we involve local people – including those from diverse groups – in decision making, working with clinical commissioners to ensure Croydon CCG continues to develop engagement in the future.

A wide variety of work has been carried out to improve public and patient involvement, ranging from grass-roots community analysis of patient experience data to options

appraisal. A list of Croydon CCG engagement activities can be found in the log referenced in below. Engagement activities include:

- Partners Workshop
- Patient and Public Forum - quarterly
- Open Governing Body meetings – bimonthly
- Pathway redesign work groups
- Cardiology
- Diabetes
- Long Term Conditions
- Mental Health
- Patient Participation Group (PPG) Summit

An essential part of our role is ensuring engagement is meaningful. We do this by listening to patients, members of the public, local communities, carers, health professionals and local groups and organisations, and using information they share with us to inform the work we do. Giving local people the opportunity to influence decision making (and most importantly communicating just how they have influenced) is vital if meaningful engagement is to continue.

The Croydon CCG Communication and Engagement Strategy has been written and is available at Appendix 3.

The establishment of a Croydon CCG Patients and Public Reference Group is planned for 2014. The Group will be made up of representatives from Health Watch, PPGs, Local Authority, Third Sector and other stakeholders and chaired by the Board Lay Member for PPI. The group's remit is to test the CCG's decisions, critique the quality of engagement activity and act as a conduit to local communities.

The Patient and Public Engagement Team is meeting with community groups and will liaise with the groups and third sector organisations working directly with more marginalised communities including, Gypsies/Travellers and the Homeless.

9 Complaints / Patient Advice and Liaison Service (PALS)

The CCG has purchased these services from the South London Commissioning Support Unit (SLCSU).

The PALS and the Complaints Service deal with queries, concerns and formal complaints relating either to the commissioning of services or to services commissioned by Croydon CCG. Since October 2013, Equality and Diversity monitoring forms have been sent with acknowledgment letters to complainants. This will be an important source of information helping us to identify whether certain groups experience problems disproportionately to other groups.

Equality monitoring is undertaken as part of evaluation of these services, and the information gathered will be analysed, brought together in Quality reports so trends and themes can be identified and addressed.

The Complaints and PALS policy sets out the process for accessing Complaints and PALS services to ensure flexibility, access and increase provision of patient information.

Information on PALS and Complaints is available on the CCG website.

<http://www.croydonccg.nhs.uk/contact/pages/comments,complimentsandcomplaints.asp>

[x](#)

Advocacy - independent advocacy is available to all patients. The ICAS (Independent Complaints and Advocacy Service) provider will ensure that any other support e.g. interpreters is also available to our patients.

10 Interpreting service

This service enables those with interpreting needs to access and increase knowledge of local health services, improving the health and wellbeing of marginalised communities and supporting community cohesion. The CCG re-procured interpreting services in early 2013 against a new improved service specification, with associated cost efficiencies.

11 Serious Incidents (SI)

Croydon CCG has purchased this service from the SLCSU. The SLCSU's SI management service ensures that appropriate management systems are in place across CCG commissioned providers to:

- Meet nationally identified standards;
- Report all SIs in a timely fashion and without prejudice;
- Have systematic measures in place to robustly and effectively manage SIs;
- Ensure actions are taken to improve quality and safety and to minimise the risk of future reoccurrences;
- Share the learning.

The CCG reviews the performance of its commissioned providers of acute and community services on behalf of Croydon residents and intelligence gained from is used to influence contract monitoring, quality and safety standards for care pathway development and service specifications.

12 Main Provider Organisations

Croydon CCG has in place mechanisms to meet its duties to ensure that key provider organisations comply with their equality duties, working in partnership with main provider organisations to include equality, diversity and human rights clauses within its contract. This also requires the CCG to monitor workforce and service delivery activity in relation to the Public Sector Equality Duty (PSED).

12.1 Croydon Health Services NHS Trust

Croydon Health Services NHS Trust is one of the main providers of hospital and community services in Croydon. Croydon CCG is the lead commissioner for this organisation and ensures that it meets its legal duties in relation to equality, diversity and human rights by including clauses within its contract. This also requires the Trust to monitor workforce and service activity in relation to the Public Sector Equality Duty (PSED).

The latest Annual Equality Reports for Croydon Health Services NHS Trust can be accessed by following the link:

<http://www.croydonhealthservices.nhs.uk/Downloads/Board%20Papers/2012/July/Equality%20and%20Diversity%20Annual%20Report.pdf>

Reports include Service Delivery and Workforce.

12.2 South London and Maudsley NHS Foundation Trust

South London and Maudsley NHS Foundation Trust provides mental health and substance misuse services in Croydon. These include child and adolescent mental health services, adult mental health services, mental health of older adult services and inpatient substance misuse services.

The latest Annual Equality Reports South London and Maudsley NHS Foundation Trust can be accessed by following this link.

http://www.slam.nhs.uk/media/165066/meeting_the_psed_at_slam.pdf

13 Equality and Diversity Progress

13.1 Equality and Diversity Strategy and Objectives

Croydon CCG developed an Equality and Diversity strategy to support delivery of their legislative responsibilities as a public body, an employer and a commissioner of services. The Strategy was designed in response to the requirements of the Equality Act 2010 and builds on the previous actions and objectives that were contained in the former Single Equality Scheme. It is also designed to meet the requirements the Human Rights Act and the NHS Equality Delivery System (EDS). The Strategy will be refreshed in Spring 2014. The Strategy can be found in Appendix 4.

The action plan supports the implementation of the strategy/equality objectives and outlines how the CCG proposes to meet its equality duties. Key objectives are focused around: putting appropriate governance arrangements in place, providing equality and diversity training, ensuring Equality Analysis assessments are conducted on all documents and services, development of patient participation groups to represent communities, utilising the JSNA and other data sources to identify gaps in service provision and ensuring Human Resources (HR) and employment policies are in line with the Equality Act 2010 and implementing the Equality Delivery System (EDS).

Development of EDS objectives will focus on the contents of the Equality Strategy and the EDS Action plans, ensuring that subsequent implementation is responsive and focused on priority areas for the CCG.

The following equality objectives have been grouped into the following key objective areas that will support Croydon CCG's vision:

Croydon CCG is committed to:

- I. Promoting equality and diversity
- II. Ensuring that all commissioned and contracted services deliver better outcomes for our population as a whole and those with protected characteristics.

III. Empowered, engaged and included staff

An Equalities Objectives Action Plan was developed in November 2013 with internal and external stakeholders. The Action Plan can be found at Appendix 5.

The Executive Equality Lead for the CCG will oversee the delivery of the action plan with the support of the Equality and Diversity Lead for NHS South London Commissioning Support Unit.

13.2 Equality Delivery System (EDS)

In 2011, the Department of Health introduced a new tool for monitoring equality outcomes called the Equality Delivery System.

During the summer of 2013 we started to develop a baseline assessment of our equality position using the nationally recommended Equality Delivery System. The EDS enables the CCG to:

- Analyse its performance against the EDS Goals and Outcomes
- Identify any gaps or areas that require improvement
- Identify any high risk areas as priorities for setting objectives

The completion of the EDS process will take place in February/March 2014 and the results and grading of our findings, key objectives and accompanying action plan will be published in April 2014.

13.3 Workforce information

The Public Sector Equality Duty highlights that information on the make-up of the workforce must be published where public authorities have 150 or more employees. Croydon CCG has a total of 21 employees and additionally purchases an extensive range of commissioning support services from the Commissioning Support Unit

The workforce is the major factor in delivery of Croydon CCG business. A quarterly workforce report is submitted to the CCG including workforce information relating to numbers of staff in post, turnover and sickness absence and an equalities profile relating to six of the nine protected characteristics. Monitoring will continue to identify any priority areas to address.

We are undertaking a programme of policy review and development of all our HR policies, including: _

- Whistleblowing Policy
- Disciplinary and Appeals Policy and Procedure
- Capability Policy
- Grievance Procedure
- Sickness Absence Policy
- Dignity at Work Policy
- Flexible Working Policy
- Change Management / Organisational Change Policy
- Study Leave and Protected Learning Time
- Equality and Diversity Policy

An equality impact assessment will be undertaken on all policies to ensure no protected group is adversely affected.

In terms of training and development, we have agreed a training package with the SLCSU to provide and monitor mandatory and statutory training including Equality and Diversity training. Further training may be commissioned following a training needs analysis.

13.4 Summary of Croydon CCG Equality and Diversity progress in 2013/14

Croydon CCG has the support and expertise of South London Commissioning Support Unit Equality and Diversity team and we have already forged a good working relationship.

The Governing body are extremely supportive of the Equality work undertaken and lay members regularly challenge the work of the CCG to ensure that people from protected groups have been considered in all decision making.

Key staff from Croydon CCG have undertaken Equality Analysis training (provided by SLCSU) and further training sessions are planned to ensure that Equality Analysis assessments are conducted on all documents and services.

Equality Analyses are being completed and used for decision making. Two examples of how the aims and outcomes of the Community Diabetes project and the Cardiology project were influenced by Equality Analyses can be found at Appendix 6.

Croydon CCG are supported by a HR Business Partner from SLCSU who has been working with the CCG to develop training packages and review HR policies.

Appendices

Appendix 1 - Croydon CCG Commissioning Intentions 2014-16



Croydon CCG
Commissioning Intent

Appendix 2 - Croydon CCG and Croydon Council Joint Commissioning intentions



Croydon CCG and
Croydon Council Joint

Appendix 3 - Croydon CCG Communications and Engagement Strategy



Croydon CCG
Communication and E

Appendix 4 - Croydon CCG Equality and Diversity Strategy 2013-2016



Croydon CCG ED
Strategy 2013-2016 \

Appendix 5 - Croydon CCG Equality Objectives Action Plan



Appendix 6 Croydon
CCG Objectives 2013

Appendix 6 - Croydon CCG Commissioning Summary of Equality Analysis around service redesign as at November 2013



Croydon CCG
Commissioning Summ

Other useful information:

Name of document	Location
Joint Strategic Needs Assessment	http://www.croydonobservatory.org/jsna/chapters201213/
2011 census	http://www.croydonobservatory.org/population/

Croydon Health Profile	 HealthProfile2013Croydon00AH[1].pdf