Patient and Client Council
Your voice in health and social care

Five Year Review of PCC Equality Scheme (June 2021)

1. Introduction

Like all public bodies, The Patient Client Council (PCC) have committed to reviewing its Equality Scheme under Section 75 of the Northern Ireland Act (1998) every five years. Ultimately, the purpose of the review is to take learning and set direction for the coming years by critically evaluating the way the organisation has implemented Section 75 over the past five years.

The review is a process of self-assessment. As specified by Equality Commission guidance[1], the review involves looking at what has been achieved, what remains to be done, and lessons learned. It should be based on evidence. The guidance states that the collection and consideration of additional quantitative and qualitative data may be necessary, alongside use of existing information from previous Annual Progress Reports on the implementation of Section 75.

This report presents the key findings from the review. Background information on the organisation and the methodology of the review is included in the opening section. The scope and structure of the concluding section is designed to cover the Equality Commission's requirements in relation to a summary of the main findings.

2. Background

The organisation

The PCC is part of health and social care in Northern Ireland. Our role is to be an independent, informed and influential voice that makes a positive difference and advocates for people across Northern Ireland in Health and Social Care. The PCC has five main statutory functions and duties. They are:

- to represent the interests of the public by engaging with them to obtain their views on services and engaging with health and social care organisations to ensure that the needs and expectations of the public are addressed in the planning, commissioning and delivery of health and social care services;

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[1] Equality Commission for Northern Ireland (2016): Guidance on conducting a 5 year review of an equality scheme.

- to promote the involvement of patients, clients, carers and the public in the design, planning, commissioning and delivery of health and social care;
- to help individuals making or intending to make a complaint relating to health and social care;
- to promote the provision of advice and information to the public about the design, commissioning and delivery of health and social care services; and
- to undertake research and conduct investigations into the best methods and practices for consulting the public about, and involving them in, matters relating to health and social care; and provide advice regarding those methods and practices.

Over the years we have spoken to tens of thousands of people to understand their views and priorities in order to influence and improve service delivery and to shape future service provision. In addition, we have helped support thousands of people through the HSC complaints process.

The PCC is a small organisation, currently comprising 32 members of staff.

Methodology of the review

This review was undertaken in partnership with the other regional HSC organisations, supported by the Business Services Organisation (BSO) Equality Unit. It involved the collection of both quantitative and qualitative data.

The desk-top based collection of in-house data was undertaken, such as the collation of figures on training and equality screenings. The PCC's Annual Progress Reports 2016-17 to 2019-20 as well as quarterly screening reports for 2020-21 were key sources of data.

The Head of Development and Corporate Services and the Business Support Manager in the PCC led on the completion of a tool, which examined key areas of Section 75 implementation.

A focus group was held by the Equality Unit on behalf of PCC and its regional partner organisations with members of Tapestry, the staff disability network of the 11 regional HSC organisations.

The findings from a focus group with members of the Equality Forum, which brings together the equality leads in the 11 regional HSC organisations, were also taken into consideration in the review.

Lessons learned and the key priorities and actions for Equality Scheme implementation over the coming years were discussed at a meeting of the PCC's senior Executive Team.

3. Key Findings

3.1 Business Planning, Policy- and Decision-Making, and Governance

Planning

The PCC Corporate Plan 2017-21 includes commitments to follow good practice on governance, inclusion, diversity and equality, and to ask service users the best way to engage with them – and develop new processes for our engagement based on these views.

Actions within the PCC Business Plans and Corporate plan relate directly to Section 75 groups, such as Carers, and those with disabilities.

Each business plan objective is supported by an operational project plan which is developed within the business year, in partnership with key stakeholders such as policy leads, service users and carers.

Also, a handbook has been developed which details specific issues and needs relating to different equality groups to be considered at the start of the business planning process. This is used by the Leadership Team at the annual planning stage as well as in-year. For example, it has been used in determining some of the key equality issues in projects developed during COVID, including work on Shielding undertaken by the PCC.

Throughout the year the Patient and Client Council will undertake projects and activities in addition to its business plan. This additional work will be informed by health and social care service developments (including consultation requests) and issues raised with the Patient and Client Council in its engagement with the public, its complaints support service and its Helpline intelligence.

Reporting

The PCC recently introduced a more formal process for the development, adoption, approval and review of policies and programmes. The development and approval process includes a front page on policy documents and papers providing a summary of any equality issues identified at the outset of the project. This process ensures that any equality issues associated with new

policies or areas of work are shared with the Leadership Team members for approval.

A database has also been created to show which policies have been screened, who completed the screening, and the date of screening. This ensures that there is a record of when policies are revised. However, it is recognised that in some cases, screening is viewed as a time consuming "tick box" exercise.

Policy and Decision-Making

PPC's Project Plan template includes a section on Equality issues, alerting lead officers of the need to consider these, undertake appropriate screening and record outcomes within the Plan.

In addition to the Project plan template, a proforma was developed a number of years ago to specifically reflect any equality issues for consideration in policy development. This is completed by Managers, with the summary of any equality issues considered and discussed within the PCC Leadership team.

As a result, consideration of equality issues at the outset of policy and decision making has been mainstreamed in the PCC quite well, although this has not translated into an increased number of published screening templates. Although the PCC is committed to equality screening all policies and decisions, this remains a challenge for the organisation.

In addition, where required, policies to support projects and work streams and their outcomes are also developed and screened by senior officers and corporate services staff, such as the Working Together policy, which guides PCC engagement work. This policy describes the principles of effective engagement and the approach PCC staff should take when engaging with Section 75 groups, and how to take equality issues into consideration.

The list of policies screened between 1st April 2016 and 31st March 2021 (see Appendix) shows that

- in total, screening templates were completed and published for 8 policies
- most of these related to corporate affairs
- two policies related to specific PCC functions.

Lessons Learned:

- It should be noted that during the reporting period, for a 2-year period 2017 to 2019, the PCC experienced substantial staffing instability. However, looking ahead, the staffing complement is now up to full capacity. This will allow for governance issues, such as equality screening to be revisited.
- In relation to project and work stream planning, the PCC has put in place governance arrangements that have shown some success in progressing the mainstreaming of equality considerations. The project planning pro forma focusing specifically on equality issues helps to ensure these are considered at the outset of the project. Staff of all grades are asked to contribute to this, and invited to give their views or highlight equality issues they believe may be important to recognise. However, it is recognised that this is not the equivalent of carrying out a full equality screening.
- Although equality considerations associated with particular work are currently discussed internally within the PCC and in dialogue with the BSO Equality Unit on an adhoc basis, it is recognised that a more structured approach is needed from a governance perspective.
- Providing the Leadership Team with a summary of the equality issues prior to taking decisions or implementing policies has ensured that decision-makers are fully informed of equality issues.

Looking Ahead:

- Although governance procedures have been put in place, screening remains a challenge. Part of the reason for this is that staff do not see the benefits of screening – it takes a lot of time, and with the staffing and resource pressures experienced by the PCC over the last 2 years especially, equality proofing has been viewed as a tick box exercise, with the benefits of screening not recognised. Moving forward will involve training staff and those at the top of the organisation to ensure there is a clear understanding that not only is equality proofing a statutory requirement, but that it can also benefit and improve the overall quality of PCC programmes of work.
- At the Leadership Team quarterly meetings, we will have a standing item looking at any changes to programmes and policies as a result of screening. We will also look at pieces of work where the screening template has added extra value in order to highlight the benefit of the screening process and to encourage staff to move away from the notion that screening is a "tick box" exercise.

- We will continue to include equality specific objectives in future Business Plans. We will highlight key equality objectives in our plan by specifying for relevant project / work stream areas which equality groupings are likely to particularly benefit from the work.
- The operational project plan developed within the business year to support each business plan objective will include a requirement to complete an equality screening template.
- We will develop an annual screening programme based on Business Plan objectives, planned projects and work streams. We will introduce the requirement to report to the Leadership Team on a quarterly basis on progress on undertaking identified screenings.

3.2   Monitoring, Access to Information and Services

The current PCC Complaints System captures gender, age and caring status of service users.

Our membership scheme includes information on gender, age, caring status and disability, as well as any reasonable adjustments or special needs members might have. For example, we collect information on whether individuals require information to be provided in braille, or large print.

Other work streams, e.g. research exploring experiences of Nursing Homes, may also involve the collection of additional monitoring data such as disability, community background, ethnic group etc. This is however dependent on individual projects.

In relation to events that we organise, the PCC's Accessible Formats Policy ensures that information can be provided in alternative formats on request and ensures that venues, information and the way the PCC conducts its meetings are accessible. When events are held, requests for particular requirements are sought, i.e. hearing loop systems, other languages, catering, accessibility, time of day etc.

Data collected is analysed and presented in reports. All reports break down data to highlight gender, age profile and geographical spread.

PCC has access to a number of equality data sources, e.g. Census, NI HSC Workforce Census, and the Human Resources system used across the HSC (for equality and diversity data for staff). Data from these sources are used, as and where applicable, in the screening of PCC policies and decisions.

However, there are limitations to the data available. For example, completion of the equality and diversity information on the Human Resources system is voluntary and whilst staff are encouraged to do so, data has become less informative. More robust data would help fully inform the equality screening of relevant policies and decisions.

Lessons Learned:

- The quality of the equality data sets that we most need to draw on for our work has significant limitations.

Looking Ahead:

- The Leadership Team will pilot the inclusion of additional data collection in our Membership and Complaints monitoring systems, including disability status, ethnicity, and community background to ensure the best way of collecting this information and to ensure service users are not put off by having to provide personal information. This will give us a better idea of what categories our membership base falls into, and will allow us to target areas of under-representation.
- We will pilot a standardised Section 75 monitoring form which can be used in all our programmes of work, including our research projects and
- We will further encourage staff to complete equality and diversity information to strengthen the data, e.g. on disability.
- In order to better gauge how diverse the voices are that we hear at our events we will:
  - look at what other HSC organisations do in terms of collecting equality/diversity information at similar events
  - pilot collecting equality/diversity information, on a voluntary basis, as part of our online events booking system, and
  - benchmark with other HSC organisations what they have done to improve engagement with Section 75 groups.

3.3   Engagement

PCC work streams are co-produced with a range of relevant stakeholders to support and encourage full partnership in decision making. This includes the input of service users.

Various project or working groups are usually comprised of representatives from within the PCC and key stakeholders, eg. HSC Trusts, the Public Health Agency, Department of Health, and the voluntary or independent sector.

Project working groups also includes representatives from our membership list. Other representation or input comes from voluntary/ community groups, who may also be a member of one or more of Section 75 groups.

As there is an Involvement Manager in each of the Trust areas, local knowledge and relationships with different Section 75 groups have been established. This has led to improved methods of engagement with groups that are easy to ignore, such as those from the Travelling Community and other ethnic minority groups through local area contacts.

In terms of our engagement with ethnic minority groups, we engage with ethnic minority forums in order to get as wide a representation as possible. However, it is acknowledged that as an organisation we have fewer contacts with more recently arrived ethnic minority groups, such as migrants and/ or asylum seekers.

Also, the PCC has good outreach with a range of disability groups, including advocacy organisations supporting those with sensory issues, physical disabilities, learning disability and mental health organisations.

We know that service users can fall into more than one of the Section 75 groups, and have adopted our engagement to facilitate this. For example, to enhance our engagement with Carers, in addition to working with generic organisations such as Carers NI, we also involved organisations linked with younger people, such as Action for Children and Crossroads NI. We also engaged with agencies across the Community and Voluntary Sector such as cancer support organisations, gender identity advocacy organisations, and Care Homes.

As a member of the Equality Forum of the 11 regional HSC organisations, PCC has access to some Section 75 groups via its consultation database, which has been used to consult with on the development of Human Resources policies, eg. Gender Identity Employment Policy. PCC also has access to other HSC forums, such as Tapestry Disability Staff Forum, to engage and consult with on a range of employment and service issues. To date, the latter have not been approached as a matter of course in the development of Human Resources policies.

Consultations are promoted via a number of different channels and carried out to ensure that people can have their views heard. It is a statutory objective of the PCC to get people involved in HSC decision making and this can include through social media, stands, newspapers, focus groups etc.

Lessons Learned:

- We recognise that even within one specific group (e.g. Carers) there is significant variation, with people falling into one or more Section 75 groups. Although we target individuals from different Section 75 groups to become involved in our work, we do not currently know which equality groupings the individuals belong to. Without this information and without targeting any particular equality groupings to encourage them to become involved we cannot be sure that we hear a diverse range of voices (e.g. those of different ethnicities, sexual orientation etc.).
- While dedicated staff forums on disability, sexual orientation and gender identity exist within the HSC, these have not been engaged with in the development of Human Resources policies as a matter of course.

Looking Ahead:

- In order to better gauge how diverse the voices are that we hear in our project groups we will:
    - look at what other HSC organisations do in terms of collecting equality/diversity information of service users that are involved
    - pilot collecting equality/diversity information on a voluntary basis
    - benchmark with other HSC organisations what they have done to improve engagement with Section 75 groups.
- We will seek assurance from our provider of Human Resources services that engagement with the existing staff forums has been undertaken for any policies they develop on our behalf.

3.4   Ensuring PCC staff assist the organisation in implementing Section 75

Whilst the new regional HSC template for Job Descriptions and Personnel Specifications no longer makes reference to the Section 75 duties, some specific PCC senior posts still include reference to the Section 75 duties, including equality screening/EQIAs.

Also, equality is recognised as a core aspect of the Knowledge and Skills Framework in performance appraisals and performance objectives for staff.

Over the past five years, PCC has put robust arrangements in place to ensure that staff complete equality training. Equality Awareness and Human Rights training is on our e-Learning training matrix for all staff. Completion of the

Making a Difference[2] equality e-learning programme is mandatory for all staff (Part 1 for all staff, Part 2 for line managers). This training is one of our actions within our Equality and Disability Action Plans.

Mandatory training requirements forms part of PCC induction programme for all staff. Compliance with all mandatory e-learning programmes is monitored by line managers at least every six months and updates provided to the Leadership Team on a regular basis. Managers follow up in 1:1 meetings and appraisals. This has proven effective, given that as at 31st March 2021:

- All of our staff had completed the Making A Difference programme.
- 8 members of staff completed equality screening training over the past five years, and 8 completed Equality Impact Assessment training.
- All PCC staff attended a face to face training session on Introduction to Equality and Equality Screening training in the last year.
- Other courses in the last 5 years include Learning disability awareness (5 individuals); Refugee Awareness and Arabic Culture Programme (1 individual); Good Relations training (2 individuals).
- In addition to the above, bespoke update sessions and consultancy from the Equality Unit is organised on an ad-hoc basis.

Lessons Learned:

- Reference to the Section 75 duties in all Job Descriptions, and in performance objectives for staff is essential for making equality everybody's business in the organisation.
- As referenced earlier, all staff are encouraged to consider and feed into the process for considering equality issues at the outset of programme development.

Looking Ahead:

- We will review how best we can monitor and encourage staff to keep up with training.
- We will seek assurance from our provider of Human Resources services that reference to the Section 75 duties is reintegrated into the template used for all new Job Descriptions.

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[2] The programme was developed jointly by all HSC organisations. Prior to the introduction of this, it had been mandatory for staff to undertake the Discovering Diversity eLearning, again a bespoke package, developed in-house.

3.5   Outcomes

3.5.1 Staff

In relation to the workplace, PCC has made significant progress in identifying and seeking to address the needs of staff and candidates with a disability. Staff awareness days have proved to be effective in increasing awareness, knowledge and skills of staff and line managers in meeting the needs of colleagues with a particular disability. In addition, Tapestry has given a platform to staff who have a disability to raise and discuss disability issues in a safe environment.

In terms of raising awareness and visibility of different equality groups, the PCC regularly has information stands at events, such as Pride, AgeNI and other events related to specific Section 75 groups.

Corporate communications are also issued to staff regarding events and international awareness days, e.g. International Women's Day, Carers Day, Mental Health Awareness Week etc.

3.5.2 Service users

For service users, a number of important outcomes have been produced for different Section 75 groups over the last number of years. Examples include:

- **Disability:** The Bamford Monitoring Group was set up by the Patient and Client Council to understand the views and experiences of people with mental health needs, learning disabilities, and their families and carers about changes being made to HSC services. Another example of outcomes in this area is the recent work as part of the Make Change Together to develop the NI Cancer Strategy 2020.
- **Carers**: Carers' rights are firmly positioned within our programmes of work and we are keen to champion the rights of carers within our organisation and services. We have ensured Carers voices are heard within our Health and Social Care Hubs and within work such as such as the development of a Mental Health Champion, the Mental Health Strategy Consultation and Adult Protection Bill.
- **Gender**: We have set up a Gender Identity Liaison panel with service users in order to help review and reform HSC services for people with different gender dysphoria.

- **Age**: Advocacy work has been ongoing with elderly residents in care homes in order to help them and their families in raising complaints. With regards to younger people, the PCC worked alongside children's advocacy organisations such as VOYPIC (the Voices of Children and Young People in Care) to ensure their opinions were reflected in future provision of mental health services.
- **Religious belief**: Over the last number of years, the PCC have targeted minority religious groups in Northern Ireland, such as the Moslem community, in order to raise awareness of our services. A secondary aim of this work was to increase the numbers of people from minority faiths on the PCC membership list.

However, we recognise that gaps do exist. We have further work to do to ensure that the voices of gay, lesbian and bisexual service users are heard, and to provide outcomes for those of different sexual orientations.

Lessons Learned:

- To date, we have mainly focused on disability in our efforts to produce outcomes for staff. We want to build on this to widen the focus to include other equality groupings.
- There have been a number of positive outcomes for most of the Section 75 groupings, as described above. This has been facilitated by the links we have with advocacy organisations representing those with a range of disabilities, transgender groups, ethnic minority organisations, and organisations supporting elderly, and children and young people.

Looking Ahead:

- In the first place, we will build a register of advocacy groups and organisations supporting people from different Section 75 groups.
- We will work with advocacy organisations in order to look at some of the issues faced by people of different sexual orientations in accessing HSC services. As a second step, we will then reflect these in our current advocacy and complaints work in order to improve outcomes for individuals of different sexual orientations.

3.6   Leadership

The PCC's Head of Development and Corporate Services is the equality lead and, supported by the Business Support Manager, acts as the main driver for the equality agenda. Both officers are members of the HSC Equality Forum facilitated by BSO's Equality Unit, who meet on a quarterly basis to share good practice in the implementation of Section 75 and to plan joint work. At a strategic level, the BSO's Equality Unit represents member organisations on a number of regional groups, reporting back to the Forum as and where required. The equality lead engages with the Equality Commission at key points.

The PCC Board are kept informed of Equality issues at their quarterly meetings, providing comment and feedback, and approving the Annual Progress Report.

Senior managers play an important role by:
- contributing to annual progress reporting by identifying relevant initiatives in their area of responsibility
- facilitating staff discussions around equality issues for each programme of work
- ensuring training attendance of relevant staff.

The PCC also provides active leadership externally by seeking to use its influence on other organisations, and encouraging the Department of Health and/or the respective HSC organisation who has asked PCC to facilitate the piece of work to consider equality issues.

Implementation of the Equality and Disability Action Plans is primarily managed by the Head of Development and Corporate Services (as the equality lead), but individual actions require participation and involvement of all staff.

Visibly promoting and celebrating diversity constitutes a further key aspect of active leadership on Section 75 implementation. For example, two disability awareness days are organised each year and all staff are encouraged to participate in these, read information provided, attend information sessions etc. Details of the HSC Tapestry Disability Staff Forum are also shared with staff, who are encouraged and facilitated to attend meetings within their working day. We currently have two representatives on Tapestry.

In addition to this, we also have 2 members on the Disability Champions Network. This is a group made up of senior leaders and board members from the regional HSC organisations which aims to promote the disability agenda.

In other areas, the development and approval of the Gender Identity Employment Policy was discussed by the Business Team and Corporate Services Management Team, with updates given at staff meetings.

A further aspect of actively promoting equality and diversity relates to sharing, acknowledging and rewarding good equality practice. Our Chief Executive Officer openly congratulates good practice, such as work to reflect the needs of those with learning difficulties, sensory disabilities and different ethnic minority groups within the recent Shielding programme.

Resources are often translated into an easy-read format – one of our staff members has a learning disability and advises and assists with this work. One example of this was in the creation of a photograph consent form.

The PCC regularly has information stands at events, such as Pride, AgeNI and other events related to specific Section 75 groups.

Lessons Learned:

- Working in close partnership with the other 10 regional HSC organisations through the Equality Forum produces important benefits for small organisations in particular, including access to resources and prompts on deadlines. Likewise, awareness of progress across partner organisations can strengthen arguments of the need to bring about progress in one's own organisation. There remains scope for strengthening of sharing of good practice across the forum to enable the organisations to learn from each other.
- To date, we have mainly focused on disability in our efforts to visibly promote and celebrate diversity. We want to build on this to widen the focus to include other equality groupings.
- Our role in identifying and promoting engagement provides a unique opportunity to visibly promote equality and diversity, in working collaboratively with other HSC organisations.

Looking Ahead:

- We will highlight and demonstrate our commitment to the equality and diversity agenda to new leaders, such as new Board members, when they join, including through training. This particularly important as Board members help shape the Corporate and Business plans for the organisation.

- The Equality Forum will dedicate more time to the sharing of good practice initiatives at its quarterly meetings.
- Over the next five years, we will widen our efforts to draw attention to equality and diversity issues relating to ethnicity and sexual orientation in the first instance.

4. Conclusions

How has the scheme's implementation benefitted individuals within the Section 75 groups?

In relation to the workplace, the PCC has made progress in identifying and seeking to address the needs of staff with a disability. Staff awareness days have proved to be effective in increasing awareness, knowledge and skills of staff and line managers in meeting the needs of colleagues with a particular disability. In addition, Tapestry has given a platform to staff who have a disability to raise and discuss disability issues in a safe environment.

For service users, important outcomes have been produced for most of the Section 75 groups. This has included tangible benefits for those with learning, physical and sensory disabilities, and individuals with mental health issues in relation to accessing HSC services. The organisation has also produced positive outcomes for those with caring responsibilities and those of different ages (including elderly and young people). Other important work has helped towards the development of HSC services for people with different gender dysphoria.

How are leaders within the authority engaged in the scheme's implementation?

The PCC's Head of Business Support is the equality lead and, supported by the Business Support Manager, acts as the main driver for the equality agenda.

The PCC Board are kept informed of Equality issues at their quarterly meetings, providing comment and feedback, and approving the Annual Progress Report.

Senior managers play an important role by
- Contributing to annual progress reporting by identifying relevant initiatives in their area of responsibility
- Facilitating staff discussions around equality issues for each programme of work
- Ensuring training attendance of relevant staff.

The PCC also provides active leadership externally by seeking to use its influence on other organisations, and encouraging the Department of Health and/or the respective HSC organisation who has asked PCC to facilitate the piece of work to consider equality issues.

Implementation of the Equality and Disability Action Plans is primarily managed by the Head of Development and Corporate Services (as the equality lead), but individual actions require participation and involvement of all staff.

Visibly promoting and celebrating diversity constitutes a further key aspect of active leadership on Section 75 implementation, including promotion of the HSC Tapestry Disability Staff Forum, and representation on the Disability Champions Network.

A further aspect of actively promoting equality and diversity relates to sharing, acknowledging and rewarding good equality practice.

Challenges and how they have been overcome

However, a key challenge over the past five years has been the mainstreaming of Section 75 and implementation of governance processes to ensure screening templates and EQIA's are published.

The PPC's Project Plan template includes a section on Equality issues, alerting lead officers of the need to consider these, undertake appropriate screening and record outcomes within the Plan. In addition to the Project plan template, a proforma was developed a number of years ago specifically to reflect equality issues for consideration in policy development.

In addition, staff of all levels are encouraged to consider of equality issues at the outset of policy and decision making, so in this respect mainstreaming of equality in the PCC works well. However, this has not translated into an increased number of published screening templates, and this remains a challenge for the organisation.

Good Practice

Beyond the measures identified in the previous section, the disability awareness days represent good practice, in the main by focusing on the lived experience of people within individual equality categories and on how staff can best support their colleagues belonging to these.

Lessons Learned

(1) Business Planning, Policy- and Decision-Making, and Governance

- It should also be noted that during the reporting period, for a 2-year period 2017 to 2020, the PCC experienced substantial staffing instability. However, looking ahead, the staffing complement is now up to full capacity. This will allow for governance issues, such as equality screening to be revisited.
- In relation to project and work stream planning, the PCC has put in place governance arrangements that have shown some success in progressing the mainstreaming of equality considerations. The project planning pro forma focusing specifically on equality issues helps to ensure these are considered at the outset of the project. Staff of all grades are asked to contribute to this, and invited to give their views or highlight equality issues they believe may be important to recognise. However, it is recognised that this is not the equivalent of carrying out a full equality screening.
- Although equality considerations associated with particular work are currently discussed internally within the PCC and in dialogue with the BSO Equality Unit on an adhoc basis, it is recognised that a more structured approach is needed from a governance perspective.
- Providing the Leadership Team with a summary of the equality issues prior to taking decisions or implementing policies has ensured that decision-makers are fully informed of equality issues.

(2) Monitoring, Access to Information and Services

- The quality of the equality data sets that we most need to draw on for our work has significant limitations.

(3) Engagement

- We recognise that even within one specific group (e.g. Carers) there is significant variation, with people falling into one or more Section 75 groups. Although we target individuals from different Section 75 groups to become involved in our work, we do not currently know which equality groupings the individuals belong to. Without this information and without targeting any particular equality groupings to encourage them to become involved we cannot be sure that we hear a diverse range of voices (e.g. those of different ethnicities, sexual orientation etc.).

- While dedicated staff forums on disability, sexual orientation and gender identity exist within the HSC, these have not been engaged with in the development of Human Resources policies as a matter of course.

(4) Ensuring PCC staff assist the organisation in implementing Section 75

- Reference to the Section 75 duties in all Job Descriptions, and in performance objectives for staff is essential for making equality everybody's business in the organisation.
- As referenced earlier, all staff are encouraged to consider and feed into the process for considering equality issues at the outset of programme development.

(5) Outcomes

- To date, we have mainly focused on disability in our efforts to produce outcomes for staff. We want to build on this to widen the focus to include other equality groupings.
- There have been a number of positive outcomes for most of the Section 75 groupings, as described above. This has been facilitated by the links we have with advocacy organisations representing those with a range of disabilities, transgender groups, ethnic minority organisations, and organisations supporting elderly, and children and young people.

(6) Leadership

- Working in close partnership with the other 10 regional HSC organisations through the Equality Forum produces important benefits for small organisations in particular, including access to resources and prompts on deadlines. Likewise, awareness of progress across partner organisations can strengthen arguments of the need to bring about progress in one's own organisation. There remains scope for strengthening of sharing of good practice across the forum to enable the organisations to learn from each other.
- To date, we have mainly focused on disability in our efforts to visibly promote and celebrate diversity. We want to build on this to widen the focus to include other equality groupings.
- Our role in identifying and promoting engagement provides a unique opportunity to visibly promote equality and diversity, in working collaboratively with other HSC organisations.

Going Forward

(1) Business Planning, Policy- and Decision-Making, and Governance

- Although governance procedures have been put in place, screening remains a challenge. Part of the reason for this is that staff do not see the benefits of screening – it takes a lot of time, and with the staffing and resource pressures experienced by the PCC over the last 2 years especially, equality proofing has been viewed as a tick box exercise, with the benefits of screening not recognised. Moving forward will involve training staff and those at the top of the organisation to ensure there is a clear understanding that not only is equality proofing a statutory requirement, but that it can also benefit and improve the overall quality of PCC programmes of work.
- At the Leadership Team quarterly meetings, we will have a standing item looking at any changes to programmes and policies as a result of screening. We will also look at pieces of work where the screening template has added extra value in order to highlight the benefit of the screening process and to encourage staff to move away from the notion that screening is a "tick box" exercise.
- We will continue to include equality specific objectives in future Business Plans. We will highlight key equality objectives in our plan by specifying for relevant project / work stream areas which equality groupings are likely to particularly benefit from the work.
- The operational project plan developed within the business year to support each business plan objective will include a requirement to complete an equality screening template.
- We will develop an annual screening programme based on Business Plan objectives, planned projects and work streams. We will introduce the requirement to report to the Leadership Team on a quarterly basis on progress on undertaking identified screenings.

(2) Monitoring, Access to Information and Services

- The Leadership Team will pilot the inclusion of additional data collection in our Membership and Complaints monitoring systems, including disability status, ethnicity, and community background to ensure the best way of collecting this information and to ensure service users are not put off by having to provide personal information. This will give us a better idea of what categories our membership base falls into, and will allow us to target areas of under-representation.

- We will pilot a standardised Section 75 monitoring form which can be used in all our programmes of work, including our research projects and
- We will further encourage staff to complete equality and diversity information to strengthen the data, e.g. on disability.
- In order to better gauge how diverse the voices are that we hear at our events we will:
  - look at what other HSC organisations do in terms of collecting equality/diversity information at similar events
  - pilot collecting equality/diversity information, on a voluntary basis, as part of our online events booking system, and
  - benchmark with other HSC organisations what they have done to improve engagement with Section 75 groups.

(3) Engagement

- In order to better gauge how diverse the voices are that we hear in our project groups we will:
  - look at what other HSC organisations do in terms of collecting equality/diversity information of service users that are involved
  - pilot collecting equality/diversity information on a voluntary basis
  - benchmark with other HSC organisations what they have done to improve engagement with Section 75 groups.
- We will seek assurance from our provider of Human Resources services that engagement with the existing staff forums has been undertaken for any policies they develop on our behalf.

(4) Ensuring PCC staff assist the organisation in implementing Section 75

- We will review how best we can monitor and encourage staff to keep up with training.
- We will seek assurance from our provider of Human Resources services that reference to the Section 75 duties is reintegrated into the template used for all new Job Descriptions.

(5) Outcomes

- In the first place, we will build a register of advocacy groups and organisations supporting people from different Section 75 groups.
- We will work with advocacy organisations in order to look at some of the issues faced by people of different sexual orientations in accessing HSC services. As a second step, we will then reflect these in our current

advocacy and complaints work in order to improve outcomes for individuals of different sexual orientations.

(6) Leadership

- We will highlight and demonstrate our commitment to the equality and diversity agenda to new leaders, such as new Board members, when they join, including through training. This particularly important as Board members help shape the Corporate and Business plans for the organisation.
- The Equality Forum will dedicate more time to the sharing of good practice initiatives at its quarterly meetings.
- Over the next five years, we will widen our efforts to draw attention to equality and diversity issues relating to ethnicity and sexual orientation in the first instance.

Appendix:
List of policies equality screened from 1 Apr 2016 to 31 Mar 2021

Year	Policy Title	Decision
2016-17	None	
2017-18	Tapestry Communication and Information Screening	Screened out with mitigation
2017-18	Consultation on Equality and Disability Action Plans 2018-23	Screened out with mitigation
2017-18	Fraud Policy	Screened out without mitigation
2017-18	Risk Management Policy	Screened out without mitigation
2017-18	Involving You Policy	Screened out with mitigation
2017-18	Final Equality and Disability Action Plans, Screening Document and Consultation report	Screened out with mitigation
2018-19	None	
2019-20	Lone Working Policy	Screened out with mitigation
2019-20	Accessibility and Quality of Continence Services	Screened out with mitigation