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REPLACES: Equalities Policy Version 1	HEAD OF DEPARTMENT: Karen Swindley, Director of Workforce & Education
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Which Principles of the NHS Constitution Apply? 1, 3, 4, 5, 6, 7	Which Staff Pledges of the NHS Constitution Apply? 1, 2, 4, 5, 6, 7
Which Aims of the Trust Apply? 1, 2 3	Which Ambitions of the Trust Apply? 1, 2, 4
Does this document meet the requirements of the Equality Act 2010 in relation to Race, Religion and Belief, Age, Disability, Gender, Sexual Orientation, Gender Identity, Pregnancy & Maternity, Marriage and Civil Partnership, Carers, Human Rights and Social Economic Deprivation discrimination? Yes	
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1) INTRODUCTION

Lancashire Teaching Hospitals NHS Foundation Trust (LTHTR) is committed to equality and diversity in employment and takes proactive steps to improve workforce diversity and to advance equality of opportunity through inclusive people management practices. The Trust is committed to challenging discrimination and treating every member of staff with dignity and respect.

This policy outlines how we will promote equality, diversity and inclusion in all areas of employment, ensuring compliance with current legislation and demonstrating best practice as an employer.

2) COMMITMENTS

It is important to us that our staff have a positive experience of work and our commitments are therefore to:

- Ensure that our workforce is representative of all groups. We recognise that diversity adds value to the culture of the organisation and enables us to provide a better quality service for our patients and service users
- Develop a culture that supports the Trust's values and ensures that staff are not subjected to discrimination, harassment or bullying at work
- Develop staff engagement opportunities to enable all staff to have a voice
- Support staff health and wellbeing, including a focus on preventing and managing work related stress
- Ensure that our workforce is supported and everyone has opportunities to reach their full potential

3) SCOPE

This policy applies to all employees, bank and agency workers, volunteers, apprentices and contractors working for or on behalf of the Trust. It is also applicable to job applicants. Our staff have the right to work in an environment that it is fair, supportive and free from discrimination and they are also expected to adopt the principles of this policy and our Trust values in every interaction with each other, patients and visitors.

The Trust is committed to the requirements of The Equality Act 2010 and this policy aims to ensure that no member of staff or job applicant receives less favourable treatment on the grounds of any of the protected characteristics (age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief and sexual orientation).

We will also ensure that no-one is treated unfairly on the grounds of trade union membership (or non-membership) or activity, or on the basis of being a fixed term or part-time worker.

4) DEFINITIONS

4.1 Equality

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Ensuring that every individual has an equal opportunity to make the most of their lives and talents, and believing that no one should have poorer life chances because of where, what or whom they were born, what they believe, or whether they have a disability. Equality recognises that historically, certain groups of people with particular characteristics have experienced discrimination and aims to challenge this (*Equality and Human Rights Commission*).

4.2 Diversity

Defined as valuing and understanding difference.

4.3 Inclusion

Taking steps to ensure that all individuals and groups feel included.

4.4 Direct discrimination

Where someone is treated less favourably than another person because of a protected characteristic that they possess

4.5 Direct discrimination by Association

For example, where an individual is treated less favourably because they are married to someone who is Catholic or because they have a family member who is disabled.

4.6 Direct discrimination by Perception

For example, where a heterosexual member of staff is bullied because their colleagues perceive that they are homosexual.

4.7 Indirect discrimination

A practice, policy or rule which applies to a group in the same way but has the effect of putting those who share a certain protected characteristic at a particular disadvantage. For example, a job advertisement which specifies that candidates must have ten years' experience could indirectly discriminate against younger candidates. In some limited circumstances, indirect discrimination may be justifiable; however there would need to be evidence that it is a 'proportionate means of achieving a legitimate aim'.

4.8 Harassment

Defined as unwanted conduct related to a protected characteristic, which will violate a person's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment for them. This also includes **harassment by association** with another person who has a protected characteristic and **harassment by perception** that a person has a protected characteristic, whether they do or not.

Examples of harassment could include bullying, nicknames, threats, banter, insults, gossip, inappropriate comments, social exclusion or unwanted physical contact. Whether harassment has occurred will be based on the victim's perception of the unwanted behaviour rather than that of the harasser, and whether it is reasonable for the victim to feel that way.

4.9 Victimisation

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Where an individual is subjected to a detriment (i.e. disadvantage, damage, loss or harm) because they have made or supported a complaint of discrimination, or given evidence related to a complaint about discrimination in good faith. There is no protection if they make or support a malicious complaint, or give evidence maliciously. Making or supporting a malicious complaint would also be a disciplinary offence.

5) LEGAL & NHS FRAMEWORKS

5.1 Equality Act 2010

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, aiming to simplify, remove inconsistencies and strengthen protection in some situations.

Under the Equality Act, there are nine protected characteristics:

Disability – if a person is disabled they have a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities

Employers and service providers are expected to make reasonable adjustments for disabled people for things that put them at a substantial disadvantage because of their impairment. From an employment perspective this may mean making a specific adjustment based on an individual's needs e.g. physical adjustments to the workplace, providing special equipment, altering working hours, reallocation of duties. Please refer to our [Supporting Disability At Work Policy](#) for further information.

Sex – the Equality Act protects both men and women. Sex equality means to be treated the same as others in society regardless of being a man or a woman. This includes such things as access to job opportunities, equal pay, access to services and career development and we need to ensure that all of our employment policies and practices apply equally to men and women.

Age – age equality protects people from discrimination, harassment and victimisation because of age, which may include because they are younger or older than a relevant and comparable colleague or job applicant. Different treatment because of age is not unlawful if it can be justified as a way of meeting a legitimate aim e.g. targeted approaches to encourage older workers to remain in work longer.

Race – race includes colour, nationality (including citizenship), ethnic origin (which includes racial, religious or cultural factors which give a group of people a distinct identity e.g. Sikhs, Jews, Romany Gypsies, Irish Travellers) and national origin (including birthplace, the geographical areas and its history).

Sexual Orientation – bisexual, gay, heterosexual and lesbian orientations are all protected under the Equality Act. Discrimination, harassment or victimisation on the grounds of perceived sexual orientation is also unlawful.

Gender Reassignment – protection is provided for someone who proposes to, starts or has completed a process to change his or her gender. There is no requirement to be under medical supervision e.g. if a male employee decides to live as a woman, but does not

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undergo any medical procedures, they are still protected. Please refer to our Transgender Policy for further information.

Religion and Belief – religion means any religion with a clear structure and belief system; and lack of religion is also covered under the Act. Belief means any religious or philosophical belief, although it must satisfy various criteria to be covered by the Act, including that it affects life choices and behaviour.

Pregnancy and Maternity – a woman is protected against discrimination on the grounds of pregnancy, childbirth and exercising her entitlement to take maternity leave during the period of her pregnancy and maternity leave. Please refer to our [Maternity Policy](#) for further guidance, including on supporting women who are still breastfeeding on return to work.

Marriage and Civil Partnership – protection is provided for employees who are married (including same-sex marriages) or in a civil partnership.

5.2 Public Sector Equality Duties

Under the Equality Act, there are three **general duties** for public sector organisations and these are to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010
- Advance equality of opportunity between those who share protected characteristics and those who do not
- Foster good relations between those who share protected characteristics and those who do not

As a public sector organisation we must therefore take account of these three duties as part of our decision making processes, as a provider of health care and as an employer.

There are also **specific duties** that we must comply with:

- Publish information to demonstrate compliance with the public sector equality duties at least annually
- Prepare and publish equality objectives at least every four years
- Analyse the effect of our policies and practices on equality (equality impact assessment)

5.3 Equality Delivery System

The Equality Delivery System (EDS) is a mandatory system specific to the NHS that helps organisations improve the services they provide for their local communities and provide better working environments, free of discrimination. It aims to embed equality into all policies and practices whilst driving up performance and going beyond the legislation. It provides a framework against which we assess and grade our performance against 4 goals:

- Better health outcomes for all
- Improved patient access and experience
- A representative and supported workforce

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- Inclusive leadership at all levels

Our Equality Strategy defines a number of objectives against each of these goals, which from an employment perspective are supported by this policy.

5.4 Workforce Race Equality Standard (WRES) and Workforce Disability Equality Standard (WDES)

Since 2015 all NHS organisations have been required to demonstrate how they are addressing race equality issues in employment (WRES). We are required to annually report our progress against a number of indicators to NHS England and we also publish this information on our website.

The WDES will be mandated through the NHS Standard Contract for 2017-2019 and the standard will use data from the NHS annual staff survey and focus on areas such as workforce representation, reasonable adjustments, employment experience and opportunities.

6) ROLES AND RESPONSIBILITIES

6.1 Trust Board

The Trust Board are accountable for ensuring that the Trust meets its' legislative responsibilities in relation to equality and diversity and for monitoring the implementation of this policy.

6.2 Workforce & Education Director

The Workforce & Education Director has lead responsibility for delivery of the equality and diversity strategy and will ensure that the views of staff from all groups, particularly those from protected groups are considered in the development of employment practices, policies and procedures.

6.3 Workforce and Education

The Workforce and Education Directorate will:

- provide advice and training to managers and staff to raise their awareness of equality and diversity and to encourage inclusive practice
- establish and maintain appropriate systems to monitor the effectiveness of this policy and report regularly to the Equality Strategy Group, Workforce Committee and Trust Board
- review all employment policies and procedures ensuring that they are in line with current legislation and are fair to all
- enable staff who believe that they have been treated unfairly to pursue a complaint through the Grievance Policy and Procedure or the Preventing Bullying and Harassment At Work Policy and Procedure
- ensure that the views of staff from all groups, particularly those from protected groups, are considered from an employment perspective

6.4 Occupational Health

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The Occupational Health Department is responsible for supporting managers in implementing the requirements of the Equality Act 2010 where they apply to health, through good practice in pre-employment screening and post-employment referrals for advice.

6.5 Managers

All managers have a responsibility for ensuring that the principles of equality, diversity and inclusion are embedded within their departments and teams.

Managers will ensure that their decisions relating to recruitment, selection, training, promotion, appraisal and any other aspects of people management are fair and non-discriminatory.

They will ensure that their staff are aware of this policy and how to raise a concern should they believe that they have experienced unfair treatment or discrimination.

Managers will deal with any complaints relating to unfair treatment or discrimination promptly, fairly and in accordance with the relevant Trust policies and procedures.

6.6 Employees

All employees are expected to live by the Trust's values so that we can create a positive, trusting, supportive working environment in which we can deliver excellent care to our patients. Individuals are personally responsible for:

- treating everyone they interact with at work with dignity, respect, fairness and without prejudice
- encourage the same levels of behaviour in their colleagues
- appreciating differences and recognising the diverse needs of everyone they come into contact with
- informing their manager if they become aware of any discriminatory practice or behaviour

Employees can be held personally liable as well as, or instead of the Trust, for any act of unlawful discrimination and this could also be a criminal offence.

7) APPLICATION & IMPLEMENTATION

The key actions that we take to demonstrate our equality, diversity and inclusion commitments to our workforce are outlined below:

Our Commitment	Our Key Actions
Ensure that our workforce is representative of all groups. We recognise that diversity adds value to the culture of the organisation and enables us to provide a better quality service for our patients and service users	<ul style="list-style-type: none"> • We undertake an annual analysis of job applicants by protected characteristic • We undertake regular audit of our recruitment and selection processes to ensure fair criteria • Advertising of jobs encourages applications from all sectors of community • We have a proactive widening participation strategy, which includes expansion of apprenticeships, work experience and work familiarisation programmes

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	<ul style="list-style-type: none"> • All staff are encouraged to disclose protected characteristics upon appointment and asked to regularly update their information to enable us to report accurately from the Electronic Staff Record • We undertake regular analysis of turnover data by protected characteristic • We continue to develop our attraction strategies for board level roles to ensure diversity at the most senior level of the organisation
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Our Commitment	Our Key Actions
Develop a culture that supports the Trust's values and ensures that staff are not subjected to discrimination, harassment or bullying at work	<ul style="list-style-type: none"> • We undertake an analysis of the annual staff survey by minority group to understand their experience of work and culture • Our Preventing Bullying & Harassment Policy provides a framework for how complaints will be handled • We undertake an annual Equality Impact Assessment of our Workforce policies • Equality and Diversity training is incorporated into a range of educational programmes for staff and managers • Our Values communications set out the behaviours we expect all of our staff to demonstrate • Our policies are developed and reviewed in partnership with staff side representatives
Develop staff engagement opportunities to provide equal access and enable all staff to have a voice	<ul style="list-style-type: none"> • We have a number of Equality Champions • We continue to develop networks for minority groups • We have a Freedom To Speak Up team who can help and support staff with any concerns about what is happening at work • We seek staff views through a range of mechanisms, including Valuing Your Voice and Big Conversation focus groups (including Big Conversations focused specifically on Equality & Diversity)
Support staff health and wellbeing, including a focus on preventing and managing work related stress.	<ul style="list-style-type: none"> • We have a dedicated Health & Wellbeing team who co-ordinate a range of initiatives to support staff health and wellbeing • We have a clinical psychologist and a counsellor providing dedicated sessions for staff • We provide staff with access to multi-faith facilities • Our managers are trained in promoting health and wellbeing and have access to a range of resources and toolkits to help them support their staff
Ensure that our workforce is supported and everyone has opportunities to reach their full potential	<ul style="list-style-type: none"> • We offer a talent management programme and attendance is analysed by protected characteristics • We promote the NHS Leadership Academy 'Breaking Through' and 'Ready Now' programmes • Our staff have open access to a range of development and educational programmes • Access to education is reported as part of our WRES submission • Through the roll out of on-line appraisal, ratings by

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	protected characteristic will be monitored
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8) COMPLAINTS ABOUT DISCRIMINATION

Discrimination on the grounds of a protected characteristic is unlawful and unacceptable within our organisation. We want our staff to feel assured that any concerns or complaints raised will be taken seriously and dealt with promptly. We will also protect individuals from victimisation arising from making or being involved in a complaint made in good faith, even if the complaint is not upheld.

If an individual believes that they have been subjected to discrimination, or if they have witnessed others being impacted by discrimination in the workplace, then they should raise this with their immediate line manager.

We recognise that there may be occasions when individuals may not be comfortable raising concerns with their manager and in these instances alternative support can be accessed from a more senior manager, the Workforce Department, trade union representatives or the Freedom To Speak Up Guardian (please refer to our [Raising Concerns At Work Policy and Procedure - Freedom To Speak Up](#))

There are differing ways of handling concerns and complaints and in some instances it may be possible to resolve issues informally through discussion or by mediation. This is not always appropriate and more formal routes would include complaints being raised under the Preventing Bullying and Harassment At Work Policy and Procedure or the Grievance Policy and Procedure. This could lead to allegations being investigated under the Disciplinary Policy and Procedure.

If allegations of discrimination, harassment, bullying and/or victimisation are found then this will be treated as gross misconduct and may result in disciplinary action.

9) MONITORING & AUDIT

Our progress in delivering of our Equality Strategy, including the commitments set out in this policy is reported annually to Trust Board.

Equality impact assessment of the recruitment, disciplinary, grievance and bullying and harassment procedures is undertaken annually and reported to the Trust's Equality Strategy Group.

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10) DOCUMENT INFORMATION

ATTACHMENTS

Appendix Number	Title
1	Sources of further information/advice
2	Relevant Legislation
3	Equality, Diversity & Inclusion Impact Assessment Tool

CONSULTATION WITH STAFF AND PATIENTS

Enter the names and job titles of staff and stakeholders that have contributed to the document

Name	Job Title	Date Consulted

DISTRIBUTION PLAN

Dissemination lead:	Enter the lead of the development group
Previous document already being used?	Choose an item.
If yes, in what format and where?	
Proposed action to retrieve out-of-date copies of the document:	
To be disseminated to:	
Document Library	
Proposed actions to communicate the document contents to staff:	Please detail how staff will be informed of document contents and changes. Include in the LTHTR weekly Procedural documents communication– New documents uploaded to the Document Library

AMENDMENT HISTORY

Version No.	Date of Issue	Page/Selection Changed	Description of Change	Review Date
1	1 May 2014	Full review	Full review of policy contents	22 February 2018

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APPENDIX 1 - SOURCES OF FURTHER INFORMATION AND ADVICE

Internal

Workforce Department Advice Line
01257 247000

Joint Staff Side
JointStaffSide@lthtr.nhs.uk
[Joint Staff Side](#)

Freedom To Speak Up Guardian
01772 522010
[Freedom To Speak Up](#)

External

Equal Opportunities Commission
<https://www.eoc.org.uk/>

Equality and Human Rights Commission
<https://www.equalityhumanrights.com/en/contact-us>

Equality Act 2010 guidance
<https://www.gov.uk/guidance/equality-act-2010-guidance>

ACAS
<http://www.acas.org.uk/index.aspx?articleid=1363>

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APPENDIX 2 - RELEVANT LEGISLATION

Equality Act 2010

The Human Rights Act (1998)

Health and Safety at Work Act 1974

Protection from Harassment Act 1997

Management of Health and Safety At Work Regulations 1999 (SI 1999/3242)

Part-time Workers (Prevention of Less Favourable Treatment) Regulations 2000

Fixed Term Employees (Prevention of Less Favourable Treatment) Regulations 2002

The Work and Families Act (2006)

The Carers (Equal Opportunities) Act 2004

The Employment Equality Act (Age) Regulations 2006

Equality in Employment Regulations (Religion or Belief) 2003

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Equality, Diversity & Inclusion Impact Assessment Form

Department/Function	Workforce & Education		
Lead Assessor	Yvonne Lowe		
What is being assessed?	Full details of the policy		
Date of assessment	22 February 2018		
What groups have you consulted with? Include details of involvement in the Equality Impact Assessment process.	Equality of Access to Health Group	<input type="checkbox"/>	Staff Side Colleagues <input checked="" type="checkbox"/>
	Service Users	<input type="checkbox"/>	Staff Inclusion Network/s <input checked="" type="checkbox"/>
	Personal Fair Diverse Champions	<input type="checkbox"/>	Other (Inc. external orgs) <input checked="" type="checkbox"/>
	<p>Please give details: JSS, JNCC, representatives of the Equality Strategy Group and Equality Champions have all been consulted in developing this policy.</p> <p>A number of the key actions described in Section 7 of this policy have also been developed taking into account the views of staff and the expertise of partner organisations. For example our Widening Participation programme has established links with a variety of local charities, Job Centre Plus, Princes Trust, Community Career Advisors, Lancashire County Council and educational establishments; and programme participants are also consulted with. The feedback from staff raised through Staff Survey focus groups and through various other staff engagement initiatives has also informed a number of our actions.</p>		

1) What is the impact on the following equality groups?

Positive:		Negative:	Neutral:
<ul style="list-style-type: none"> ➤ Advance Equality of opportunity ➤ Foster good relations between different groups ➤ Address explicit needs of Equality target groups 		<ul style="list-style-type: none"> ➤ Unlawful discrimination, harassment and victimisation ➤ Failure to address explicit needs of Equality target groups 	<ul style="list-style-type: none"> ➤ It is quite acceptable for the assessment to come out as Neutral Impact. ➤ Be sure you can justify this decision with clear reasons and evidence if you are challenged
Equality Groups	Impact (Positive / Negative / Neutral)	Comments:	
		<ul style="list-style-type: none"> ➤ Provide brief description of the positive / negative impact identified benefits to the equality group. ➤ Is any impact identified intended or legal? 	
Race (All ethnic groups)	Neutral		
Disability (Including physical)	Neutral		

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and mental impairments)		
Sex	Neutral	
Gender reassignment	Neutral	
Religion or Belief (includes non belief)	Neutral	
Sexual orientation	Neutral	
Age	Neutral	
Marriage and Civil Partnership	Neutral	
Pregnancy and maternity	Neutral	
Other (e.g. caring, human rights, social)	Neutral	

2) In what ways does any impact identified contribute to or hinder promoting equality and diversity across the organisation?	<p>This policy itself should not have any adverse impact on any group. The policy encourages inclusion for people from all groups and backgrounds to be treated equally. Any issues identified in Section 1 will be addressed through the Workforce Equality Improvement Action Plan.</p> <p>This policy sets out how the Trust aims to achieve equitable experience and outcomes for all of our staff. The intent of the policy is that no group or individual will be treated less favourably than others. There are a number of ways in which the effectiveness of the policy is measured and these are summarised below.</p> <ol style="list-style-type: none"> 1. The Trust demonstrates how it is addressing race equality issues in its Workforce Race Equality Standard submissions. The latest submission (2017) shows: <ul style="list-style-type: none"> • The percentage of BME staff in the overall workforce is reflective of the population it serves however it is noted that the number of BME staff in senior roles is significantly lower than white staff • There is no significant statistical evidence that indicates that either BME or white staff are more likely to enter a formal disciplinary process. • That there could be an issue with BME staff accessing non mandatory training and CPD • BME staff are less likely to experience harassment, bullying or abuse from patients, relatives or members of the public than white staff • BME staff are slightly more likely to experience harassment, bullying or abuse from colleagues than white staff. • BME staff are more likely to experience
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discrimination at work than white staff

The Trust has developed an Equality Improvement Action Plan to address the issues identified which includes amongst a number of actions; identifying Equality Champions and improved training and development around equality and diversity.

2. There is also an annual Equality Impact Assessment in relation to staff accessing the Trust's Disciplinary, Grievance and Harassment policies. The assessment for 2016/17 looked at the protected characteristics of staff accessing these policies and the conclusion was that the profiles of these staff were in line with expectations based on the Trust's overall workforce profile during the same period. The number of staff accessing these policies was however very small and no statistical significance could be attached. Monitoring will continue and the impact assessment extended to include staff managed under the formal stages of the Performance Management and Attendance Management policies; and dismissals under any procedure.
3. The Trust also analyses access for staff to talent management processes and talent opportunities. The analysis for 2016 participants found that programme attendees were fairly reflective of the demographic makeup of the overall organisation; however as a significant proportion of staff chose not to disclose if they had protected characteristics it is unclear if this analysis is truly accurate. A questionnaire has also been undertaken across the organisation with regard to access to career development opportunities. The response rate was small and the results unlikely to be statistically valid; however they indicate that ethnicity, sexual orientation and disability have not have an impact on achieving career development or gaining access to development opportunities. Staff who identify as having a disability are however more likely to experience adverse impact, in terms of being less able to access career development or development opportunities. Further consultation and analysis will be required.
4. An annual equality impact assessment of recruitment processes is undertaken. The most recent one for the period December 2016 – December 2017 looked at the total number of applications received within that time period, analysed by protected characteristics, compared to number of shortlisted and appointed candidate. For each characteristic the analysis found:
 - Sex – a higher percentage of females were

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shortlisted than males; however the same or similar percentage across the two sexes attended interview and were appointed. There is therefore no evidence of bias in the numbers of candidates appointed.

Age – the least applications were received from candidates in the younger and older categories but these candidates had a higher percentage of appointment at interview, supporting a view of no age bias.

Ethnic Origin – 11% more white compared to BME candidates who attended interview were appointed to the role, although this may be due to certain vacancies attracting a higher proportion of BME candidates which can skew the figures. Further monitoring and actions are being undertaken, including linking in with the BME population to understand their perceptions of working at the Trust and to consider what action can be taken to support more candidates from a BME background into posts within the Trust.

Disability – 12% less candidates who identified as having a disability were appointed following interview, compared to those who stated they did not have a disability. Further actions will be identified by the Workforce Equality Group to understand any barriers to recruitment for the disabled population along with training for managers to ensure the Trust is making reasonable adjustments for new starters.

Sexual Orientation – the numbers of applicants who identified as belonging to a group within this protected characteristic were low, however those who identified themselves as lesbian appeared to have a greater chance of being appointed. Due to the low numbers this could be misleading and further monitoring of this will continue to ensure a fair and equitable process.

Transgender – low numbers of applicants identified as transgender; however there was no evidence that identifying as transgender impacts on candidates being appointed.

Religion & Belief – there was no evidence to suggest there was any bias in relation to appointment of candidates on the basis of religion and belief.

Our recruitment processes are supported by an extensive Widening Participation programme, which reaches out to local charities, colleges and other educational establishments. A number of initiatives have been progressed to help those with disabilities and disadvantaged backgrounds to increase employable skills; and to raise awareness of career opportunities within the Trust. This includes the Work Familiarisation programme for young people with disabilities, pre-employment programmes with

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	<p>Job Centre Plus and Not in Education, Employment or Training schemes for young people. We have also significantly increased our numbers of apprenticeships.</p> <p>5. Our staff survey results are analysed to seek to understand staff experience in relation to equality issues; however full analysis of the 2016 results by protected characteristic was constrained by the data provided by Picker Institute and an element of non-disclosure. A more detailed analysis has been requested from Picker for the 2017 results and a specific equality action plan will be created to address any issues raised by the survey.</p>
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- 3) If your assessment identifies a negative impact on Equality Groups you must develop an action plan **to avoid discrimination and ensure opportunities for promoting equality diversity and inclusion are maximised.**
- This should include where it has been identified that further work will be undertaken to further explore the impact on equality groups
 - This should be reviewed annually.

ACTION PLAN SUMMARY

Action	Lead	Timescale

Lancashire Teaching Hospitals NHS Foundation Trust		ID No. TP/146
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