



North Central London
Integrated Care Board

An abstract graphic on the left side of the page, composed of several overlapping, flowing lines in orange and blue. The lines create a sense of movement and depth, framing the central text.

23/24 Equality Information Report (Workforce)

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Executive Summary

The Equality Information report demonstrates how NCL ICB is complying with the Public Sector Equality Duty of the Equality Act 2010, and details progress made against workforce and patient/community related equality priorities.

The ICB is committed to providing inclusive services which meet the diverse needs of our patients, community and staff. This commitment was brought into focus over the last three years when COVID-19 highlighted the challenges that some of our staff and patients faced - ensuring equality, diversity and inclusion are central to delivering fair employment practices and ensuring our services are able to respond effectively remains our priority.

Our key achievements relating to the workforce over the 2023/24 year include:

- **Completion of the organisational change programme** in accordance with the Equality Impact Assessment to mitigate adverse impact on any protected groups of staff.
- **Joined the Mayor of London's workforce Integration Network (WIN)** to reduce inequalities that some minority groups face in the workplace.
- Slight increase in **representation** of staff from a BME background
- Slight overall **increase in the representation** of staff from a BME background in roles at band 8a – Very Senior Manager (VSM) level.
- Reduction in staff from a BME background feeling **discrimination from managers, team leaders or colleagues.**
- The relative likelihood of BME staff entering the **formal disciplinary process** compared to white staff has declined.
- An increase in the number of staff reporting their **disability status**
- The **ICB's gender mean pay gap** is 0.88% less than the 23/24 national gender mean pay gap and 4.57% less than the 23/24 national gender median pay gap.
- Establishment of a **Women's Network**
- Promotion of the role of the ICB's **Wellbeing and Inclusion Guardian**
- Introduced a **buying and selling annual leave** scheme

- Improved **staff benefits** with the introduction of a car lease scheme, cycle to work scheme and access to the Blue Light card

Workforce EDI performance

The staff survey results and EDI performance against several performance metrics show that whilst the ICB has seen some improvement in several areas including line management support, working with colleagues, Disability status representation, BME staff representation, including at senior levels and a decline in the relative likelihood of BME staff entering formal processes in comparison to white staff, our data shows there are several key themes and trends that need significant improvement so that our staff have better experiences in these areas.

It was disappointing to see that the ICB's performance against many of the WRES and WDES indicators have declined over the past year, particularly the standards relating to recruitment. Although the ICB had very few posts that were subject to open recruitment due to filling many of the posts in the new structure via the internal processes in accordance with the Change Management Policy, the inclusive recruitment programme that was undertaken by the ICB to strengthen fairer and equitable recruitment practices mirror the approaches taken by NHS other organisations. In view of our performance in this year, this will form an area of priority over the coming year which we plan to strengthen with external expert support.

Many of the areas of our EDI performance for example those relating to access to career progression, learning and development opportunities and experiences of bullying and harassment also correlate to a decline at an organisational level. In turn, there are clearly some areas that we need to pay greater attention and focus to over the coming year with engagement and input from our staff networks and right external expert support, in particular the support for staff with long-term conditions and improving the likelihood of individuals with a BME background/ a disability or long-term condition being appointed from the shortlisting stage.

Forward look – 24/25

The ICB will look to develop an Equity and Inclusion programme with specific and tangible actions and set targets in line with the NHS Equality, Diversity and Inclusion improvement

plan¹. This targeted EDI programme will now move beyond the scope of the initial Equity and Inclusion programme that formed part of the 3-year OD plan that was approved by the Board in July 2023. The following high priority EDI programmes of work will be delivered over the coming year and will be underpinned by two equality objectives:

1. To develop a culture of equity, positive diversity and comprehensive inclusion for all, where staff can bring their whole selves to work safe in the knowledge they will be valued and respected.
2. Managing the ICB change programme in a fair and equitable way that values diversity and inclusion, recruits, retains and attracts a diverse range of employees

Key programmes of work during 24/25 include:

- ✓ Redesigning and relaunching our **Values and Behaviours framework** with staff and staff networks, including civility and respect that will determine the acceptable and unacceptable behaviours and place a strong emphasis on the types of behaviour that create a more inclusive and **psychologically safe environment**, to enable all our staff to thrive in a safe inclusive environment.
- ✓ Strengthen our **approach to inclusive recruitment**.
- ✓ A **health and wellbeing survey** to revise, promote and deliver health and wellbeing offer to respond to survey and in line with national guidance and aligned with system arrangements.
- ✓ Design and launch an **anti-racist programme** to enable the ICB to be an anti-racist organisation and to tackle inequality.
- ✓ Roll out of a **learning and development programme** that will give staff access to clinical and professional development and greater non-mandatory training.
- ✓ Continue to develop a culture of equity, positive diversity and comprehensive inclusion for all, where staff can bring their whole selves to work safe in the knowledge they will be valued and respected, through the continuation of our **High Performing Teams** and **Leadership Development programmes**.
- ✓ Sign up to the national **sexual safety charter** and develop working group and plan to meet the underpinning actions.

¹ [NHS England » NHS equality, diversity and inclusion \(EDI\) improvement plan](#)

- ✓ Re-design and roll out **corporate and local induction** for new starters (staff and managers) to reflect vision and values and create an interactive experience.
- ✓ Work with the carers, Disabilities and Long-Term Conditions network to refresh, promote and embed the **Workplace Adjustment Passport, wellbeing conversations** and guidance for managers.
- ✓ Continue Zero Touch **HR Artificial Intelligence (AI)** automation platform that empowers automated self-service actions and answers
- ✓ **Overhaul HR Policies and procedures** in line with Fair Experience for All and Just and Restorative practice and review employee relations reporting arrangements to include any trends in variation, themes and disparity.
- ✓ To successfully **stand-up the new People and Culture Directorate** and embed the new structure and develop the function in line with the national people digital strategy, #inclusive HR programme, NHS Futures programme for HR and OD professions.

The delivery and impact of the delivery of our workforce programme will be monitored and reported to the People and Culture Oversight Group (PCOG) and Executive Management Team (EMT).

Associated documents

This report should be read in conjunction with the following reports:

- 23/24 Equality Information Report (Health Inequalities)
- 23/24 WRES Report
- 23/24 WDES Report
- 23/24 Gender Pay Gap Report
- 23/24 EDS22 Report
- 23/24 People & Culture Annual Report
- 23/24 OD Plan Progress Report

Introduction

The purpose of the 2023-2024 Equality Information Report is to provide assurance to the NCL ICB Board that the ICB continues to meet its responsibilities under the Equality Act 2010 and meets the requirements of the Public Sector Equality Duty.

This report outlines key achievements relating to the workforce during 2023/24.

The Public Sector Equality Duty of the Equality Act 2010 helps organisations to put in place a framework for monitoring and measuring equality performance against the requirements. This report and the equality information profile illustrate how the ICB are doing this and plan to improve on this through:

- Eliminating unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act.
- Developing an inclusive culture, where health and wellbeing needs are met and people feel valued, supported and safe
- Listening to and amplifying the voices of people from diverse groups, through the support of allies
- Developing a diverse and representative workforce and advancing our corporate commitment to equality, diversity and inclusive leadership

The Equality Delivery System is a framework for assessing the equality performance of NHS organisations and identifying areas for improvement. The ICB's equality priorities and objective have been set in line with the goals set out by this framework as well as with an aim to tackle key areas of improvement identified as part of the Gender Pay Gap Report, Workforce Race Equality Standard (WRES) reporting and Workforce Disability Equality Standard reporting (WDES).

The reporting period is typically 1 April 2023 – 31 March 2024 to reflect the statutory or mandated national NHS frameworks.

Equality, Diversity and Inclusion: Leadership Commitment

Equality, diversity and inclusion is integral to all policies, processes, practices, decision making, and everything that we do. Following the establishment of NCL ICB on 1 July 2022, the new ICB Executive Management Team (EMT) are committed to creating a work environment that is safe, healthy, compassionate, representative and inclusive for all our staff. EMT are committed to developing a culture that makes the ICB a great place to work, where staff are proud and excited to work.

The EMT are committed to creating a positive culture that respects all individuals and promote positive practice that values the diversity of all individuals and communities. This report forms part of EMT's commitment to ICB staff and the North Central London patient community.

The EMT have discussed the important of ensuring that equality, diversity and inclusion and the need to promote this both within corporate developments for the organisation but also within core business strategies. As part of this, there is commitment to creating an inclusive work environment as well as building an organisation where the diversity of our people is valued and utilised.

Equality, Diversity and Inclusion: Governance

Workforce Governance

Following the establishment of the ICB, the following governance arrangements have been put in place regarding the workforce equality and diversity.

Executive Director Leadership

The workforce equality, diversity and inclusion portfolio and team sit under the executive leadership of the Chief People Officer.

The health inequalities portfolio and strategy, communities and research team sit under the executive leadership of the Chief Strategy & Population Health Officer.

Non-Executive Board Member as the ICB Wellbeing and Inclusion Guardian

We rely on our diverse and skilled staff to achieve our ambitions to improve health and wellbeing and reduce inequalities for people across North Central London, so it's vital that we protect the health, wellbeing and inclusion of our staff and make sure they feel included and supported within NCL ICB.

As decisions made at board level can impact staff, it is important that we have a member of the board whose role is to make sure any significant changes made have capacity to improve the wellbeing of staff and promote inclusion. The role of the Wellbeing and Inclusion Guardian is to act as a critical friend to the board, challenge the board to place wellbeing and inclusion at the heart of all that they do, and hold the board to account for undertaking improvement work as required to enhance the wellbeing and inclusion of employees.

Our Wellbeing and Inclusion Guardian is Liz Sayce who is a Non-Executive Member of the NCL ICB Board. Liz works closely with our Chief People Officer, Sarah-Louise Morgan, and our staff networks to champion wellbeing and inclusion, ensuring all voices are heard across the organisation.

People & Culture Oversight Group (PCOG)

The PCOG has been established in accordance with the constitution of the ICB Board and is a forum that engages staff on our key people matters. The key responsibilities of the PCOG include approving new/revised HR policies, reviewing of and making recommendations on diversity and inclusion statutory reports to the ICB Board, oversight and scrutiny of all staff engagement and staff network work programmes, and staff communication and engagement plans. The PCOG also provide feedback on key areas they believe improvement is needed to facilitate a link between staff needs and the Senior Leadership Team.

The membership of PCOG is multi-disciplinary and includes a number of representatives across the ICB, including members of the Executive Team, Chairs of each of the Staff Networks, trade union representation and staff representation from each of the ICB Directorates.

NCL ICB Board

NHS England has set out the following as the four core purposes of an Integrated Care System:

- a) Improve outcomes in population health and healthcare;
- b) Tackle inequalities in outcomes, experiences and access;
- c) Enhance productivity and value for money;
- d) Help the NHS support broader social and economic development.

The ICB will use its resources and powers to achieve demonstrable progress on these aims, collaborating to tackle complex challenges which include:

- a) Improving the health of children and young people;
- b) Supporting people to stay well and independent;
- c) Acting sooner to help those with preventable conditions;
- d) Supporting those with long-term conditions or mental health issues;
- e) Caring for those with multiple needs as populations age;
- f) Getting the best from collective resources so people get care as quickly as possible.

The ICB Board is responsible for ensuring the ICB acts in a way that is consistent with its statutory functions, both powers and duties. Many of these functions are set out in the 2006 Act and include equality, including the public sector equality duty (under the Equality Act 2010) and the duty as to health inequalities, (Section 14Z35).

Equality, Diversity and Inclusion (EDI): Workforce

This section outlines the ICB's work programmes and performance against the equality, diversity and inclusion standards during 23/24.

23/24 has been an extra-ordinary year for ICB staff with an organisational change programme that has spanned the full year. The level of changes during the organisational change programme and experienced by ICB staff is more so than many other ICBs. The organisational change programme has played a key role in shaping many of our workforce activities delivered throughout the year.

The following information is provided in this report:

1. Information regarding the context and background of the ICB organisational change programme
2. NCL ICB workforce equality and diversity representation
3. Overview of key achievements and programmes of EDI delivered during 2023/24
4. Overview of staff engagement and the achievements of the ICB staff networks
5. Performance against the EDI standards (WRES, WDES, Gender Pay Gap and EDS22)
6. 23/24 Key EDI trends
7. Overview of the 24/25 EDI workforce priorities

23/24 - A year in context

The following contextual factors have played a key role in determining and shaping the activities and achievements of the people function:

Organisational Change Programme

The ICB formally commenced an organisational change programme on 1 February 2023. The aim of the change programme was to meet the vision of the ICB that is centred around the following three key pillars:

1. To deliver the priorities, namely the Population Health and Integrated Care Strategy that will provide our communities with better care and support through more joined-up and sustainable health and care services.
2. Ensure structures and processes are fit for purpose
3. [Meet the Running Cost Allowance reduction set by NHSE](#)

The organisational change programme focused on three components (organisational design, ways of working and organisational development) and involved three phases of work over that rolled into 2023/24 and will conclude in 2024/25:

- Phase 1: Setting the design foundations and defining the ICB's future operating model.
- Phase 2: Engagement and consultation with staff and key stakeholders on the outputs of phase 1.
- Phase 3: Implementation of final structures and organisational development to support new ways of working

Phases 1 and 2 spanned the full 23/24 financial year and involved informal and formal engagement and consultation with staff to enable them as key stakeholders to feed into the final ICB organisational structure.

The majority of the roles in the new structure were filled via internal processes in accordance with the ICB's Change Management Policy. As part of the Organisational Change Programme, we were pleased to be able to offer staff the option of voluntary redundancy following approval from NHS England. Running a voluntary redundancy scheme enabled the ICB to minimise compulsory redundancy as far as possible and gave affected staff a choice about their future.

Given the extent and impact of the changes to the ICB operating model, many of the people related activities and priorities directly or indirectly centred around the change programme.

The organisation transitioned to the new structure on 1 April 2024.

The focus in 24/25 will shift to the organisational development and ways of working workstreams.

3-year Organisational Development (OD) plan (2023-26)

In July 2023, the Board approved a 3-year (23-26) OD plan for the ICB. The OD plan is based on the evolved Culture and Leadership Programme based on best practice, developed by Professor Michael West and sponsored by NHSE which focuses on 6 key pillars:

- **Vision and Values** - An inspiring and shared vision and values that sets a clear direction and expectations; creating a strong identity and thriving culture that fosters pride and positivity.
- **Goals and Performance** - Clear priorities and objectives at every level and intelligent data informing all about performance. Recognising and rewarding good work and ensuring resources are available and used well.
- **Learning and Innovation** - Investing in opportunities for people to nurture, grow and improve how work gets done, ensuring fair and equitable access to learning, development, innovation and career progression.
- **Support, Compassion and Wellbeing** - Nurturing a compassionate and psychologically safe culture, where staff feel cared for, valued and respected and feel confident to raise concerns knowing they will be addressed.
- **Equity and Inclusion** - Equity, positive diversity, and comprehensive inclusion for all, where staff can bring their whole selves to work safe in the knowledge they will be valued and respected.
- **Team and System Working** - Effectively functioning team and inter-team working with role clarity, shared objectives, and cooperation; working collaboratively across organisations and systems.

The overall aim of the OD plan is to: ***support the delivery of the change programme by focusing on creating a healthy culture driven by strong values, high capability and***

effective relationships and ways of working that will enable the NCL ICB to adapt, perform and thrive now and in the future.

Although we have been undergoing significant change, we have not been standing still in terms of starting to put in place actions to address the staff survey results in line with the 3-year OD plan approved in July 2023. Although this was not in time to materially impact the 2023 staff survey, this is a multi-year plan we anticipate that the work undertaken should start to show some strides to improving staff experience in the organisation by the time of the 2024 survey.

A detailed summary of the Phase/Year 1 plans, timescales for delivery and associated lead responsibilities was developed in Q1 (23/24) and presented to the Board in July 2023.

Following the launch of the formal consultation on the proposed changes to the organisational structure and operating model of the ICB, it became critically important that there was a need to review the timescales for delivering some of the phase 1 priorities in particular those priorities that required co-design and engagement with staff because it became clear that there would be low meaningful engagement from staff due to the impact of the re-organisation on staff morale and the uncertainty of their future with the ICB and securing roles in the new structure. It was also important to provide managers and staff with the appropriate support and capacity to enable them to meaningfully engage during the formal consultation process, attend career transition support workshops, partake in selection processes (where required) and allow staff time to transition to new roles, teams and ways of working in the new structure.

In view of the above factors, the timescales of delivering some of the phase 1 actions, particularly those activities requiring co-design and staff engaged were revised to a later date after the transition to the new structure. Examples of activities that have a revised date of delivery during 24/25 include co-design of vision, values and behaviours framework and co-design of values-based performance management and the appraisals process. The progress against the phase/year 1 plan can be found in the document titled NCL ICB OD Plan Progress Update.

The 3-year OD plan is available to review within the [July 2023 ICB Board papers](#).

Workforce Representation

Whilst there has been greater staff movement than in previous years due to a number of staff leaving the organisation via the voluntary redundancy scheme, the ICB's workforce representation regarding each of the protected characteristics has remained largely the same. This is not unexpected particularly because the majority of the roles in the new structure have been filled by existing staff in line with the Change Management policy and processes.

The following summary provides an overview of the ICB workforce representation regarding each of the protected characteristics as of 31 March 2024 and a brief comparison is provided against the composition as of 31 March 2023.

- **Age:** The majority of ICB staff fall within the 41-50, followed by the 51-55 and 46-50 age groups
[March 2023 comparison](#) - There has been little change in the composition of the age profile of ICB from 31 March 2023.
- **Disability:** The majority of staff within the ICB have declared that they do not have a disability (83%) and 9% of staff have declared a disability. Approximately 8% of the workforce have chosen not to declare a disability or prefer not to answer.
[March 2023 comparison](#) - In comparison to the March 2023 data, there has been an increase in the number of staff that have confirmed whether they do/don't have a disability and a reduction in the number of staff that chose not to declare a disability (16% to 8%).
- **Ethnic Group:** Overall, the NCL ICB workforce from BME (45%) and White backgrounds (47%) is broadly reflective of the NCL population demographic. A higher proportion of ICB staff in roles that are Band 3, 4, 5, 6, 7 and 8A are from a BME background than a white background. In contrast, this is reversed for roles 8B to Very Senior Manager (VSM) levels.
[March 2023 comparison](#) - In comparison to the March 2023 data, the workforce representation of BME staff has largely remained relatively the same, however, there

has been a reduction in the representation of staff from a White background. It should also be noted that whilst the gap has reduced at the 8b level, there remains a significantly higher proportion of staff that are from a white background than a BME background in roles at 8C to VSM level.

- **Gender Identity:** Describes how a person identifies their gender and whether they identify as male, female, intersex or a member of the trans umbrella (including but not restricted to, non-binary, gender fluid or transgender). The equality data fields relating to gender identity on ESR are restricted to female and male. Feedback has been provided to the Workforce Information Team and the national NHSE team together with IBM who manage the national ESR system to change these categorisations and make them more inclusive. The majority of the workforce identify as female (64%).
[March 2023 comparison](#) The representation of female and male staff in comparison to the March 2023 data has remained relatively the same.
- **Marriage and Civil Partnership Status:** Most staff are married, followed by having a single status.
[March 2023 comparison](#) - There has been little change in the composition of the marriage and civil partnership profile of ICB staff from 31 March 2023.
- **Sexual Orientation:** The majority of the ICB workforce identify as heterosexual/straight (approx. 83%). There are a significant proportion of staff who have not stated or have decline to provide their sexual orientation status (around 12%). Staff identifying as gay or lesbian (4%) make the third largest category, followed by bisexual (around 1%). Staff who have listed as identifying as other sexual orientation that is not listed make up the smallest proportion of our workforce (around 0.5%).
[March 2023 comparison](#) - There has been little change in the composition of the sexual orientation profile of ICB staff from 31 March 2023.
- **Religious Belief:** Nearly a quarter of staff have chosen to not declare their religious belief. Approx. 34% of staff have a religious belief of Christianity, followed by Atheism (around 15%) and Islam (around 9%).
[March 2023 comparison](#) - There has been little change in the composition of the religious belief profile of ICB staff from 31 March 2023.

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It should be noted that the ICB is currently recruiting to a number of new vacant roles in the new structure. We will be looking to build and strengthen our approach to inclusive recruitment, and in turn the ICB workforce profile against each of the protected characteristics is likely to further change during 24/25.

23/24 Key Activities and Achievements

Although the organisation has been undergoing significant organisational change, several new and improved workforce initiatives have been implemented to lead our people and create a work environment that is safe, healthy, compassionate and inclusive for all our staff to achieve our ambition to make the ICB a great place to work. The following section provides an overview of the key EDI activities and achievements that are aligned to phase 1 of the OD Plan.

Staff Engagement - Networks and Forums

The ICB staff networks play a critical and key role to drive the equality, diversity and inclusion priorities for the organisation and the ICB continues to strengthen staff engagement of our diverse workforce via the range of staff networks and forums (BME, Carers, Disability and Long Term Conditions, LGBTQ+, Greener network, Engaging our People Forum, PCOG and Joint Partnership Group) allow colleagues to discuss experiences, offer a safe space and contributing to our workforce priorities to shape a more inclusive and fairer organisational culture.

During 2023/24 a Women's Network has been established and the governance arrangements of the networks have been strengthened with an Executive Management Team sponsor for each network and reporting arrangements to the People and Culture Oversight Group (PCOG).

Core skills for managers programme

A Core Skills for Managers programme that was developed in 2022/23 continued during the early part of 2023/24. The aim of the programme is to strengthen and enhance management capability across the organisation, ensuring staff at every level are provided with the right skills and knowledge to develop, grow and support their staff and teams. The programme has the golden thread of equality and inclusion running through each module. To date,

approx. 80 managers have completed the programme. This programme was followed up by providing a smaller cohort to access a Senior Leadership Programme that was delivered by UCLH. The programme was paused due to the organisational change programme but will resume in 2024/25 and continue to run on a rolling basis for all managers to access.

Learning and development review

A learning and development review was undertaken in March 2024 to inform a learning and development programme that will be developed and rolled out during 2024/25. The learning and development programme will provide more fair and equitable access to key opportunities including clinical and professional development, access to role/function specific training following a training needs analysis (TNA) at Directorate level, development of a supervision model for clinical and non-clinical staff with a high-level emotional burden and re-design of the appraisal and personal development (PDR) process to better align with the ICB's business planning cycle, objectives and values and behaviours framework.

Leading change

To upskill and enable managers to lead the change programme at a local level and support staff during this time, a programme of support was put in place for managers to ensure they had the right skills and knowledge to lead change at a local level and support staff. The manager's programme included a series of briefings and question and answer sessions with the Chief People Officer and Director of People, Manager's briefings, 1:1 drop-in sessions and resource packs with information, guidance, FAQs, template letters and meeting guides.

Wellbeing and Inclusion Guardian

Following the appointment of Liz Sayce, Non-Executive Board Member as the organisation's Wellbeing and Inclusion Guardian. The role of the Wellbeing and Inclusion Guardian is to act as a critical friend to the board, challenge the board to place wellbeing and inclusion at the heart of all that they do, and hold the board to account for undertaking improvement work as required to enhance the wellbeing and inclusion of employees. The appointment and role of the Wellbeing and Inclusion guardian was promoted across the ICB, including the staff network chairs and vice-chairs.

Buying and selling annual leave

The ICB is committed to supporting employees to achieve a healthy balance between their work and personal life, in the best interests of both service delivery and the wellbeing of individuals. To support this, a Buying & Selling Annual Leave policy was rolled out in 2023/24 to enable employees to have the option to request to buy up to one additional week's annual leave or sell up to one week's annual leave and is designed to give employees extra flexibility with regards to their commitments and responsibilities.

Financial wellbeing

Supporting staff from a financial wellbeing perspective has become critically important, particularly with the increasing cost-of-living challenges. A range of national, regional and local financial information, resources and support have been made available for staff to access. In turn, during 23/24 the ICB has:

- ✓ Provided staff with funding to obtain a Blue Light card to receive discounts on a range of areas that are exclusively available for NHS workers.
- ✓ Rolled out access to salary sacrifice schemes including the cycle to work scheme and car lease scheme
- ✓ Provided staff with access to 1:1 pension clinics with the Pensions Manager to answer any questions and provide information on their pension/retirement options.

Financial constraints can also have an impact on staff mental health and wellbeing.

Information has been shared with regards to the support pathways available via access to mental health and wellbeing champions, occupational health and the employee assistance programme.

Supporting staff through change

Following a health and wellbeing survey that was undertaken in late 2022/23 and during the early stages of the organisational change programme, it was identified wellbeing support was a critical need identified by staff. In turn, staff were provided with access to the following webinars:

- ✓ Living with anxiety during uncertain times - to help staff to develop strategies to help them manage symptoms of anxiety during uncertain times.
- ✓ Navigating redundancy – to help staff understand the emotional impact of redundancy and learn practical strategies to manage wellbeing.

- ✓ Managing organisational change webinar – to help staff understand the link between change and emotional health and strategies to help themselves and others.

Support also continued to be provided via the occupational health and employee assistance programme on a range of areas including emotional support and general health and wellbeing matters.

Equality Impact Assessment

Throughout the change programme, Equality Impact Assessments (EQIAs) were completed both pre and post consultation to determine the impact of the changes to the organisational structure on staff in accordance with the ICB's EQIA framework and principles to ensure 'due regard' to the public sector equality duty.

To support and inform the equality impact assessment work during the organisational change programme and following support by the staff networks, all staff were invited to update their equality information between August -September 2023. This provided staff with an opportunity to provide/update their equality information and enabled staff who hadn't declared or provided equality information to be reduced for each protected characteristic.

A number of actions were undertaken to mitigate any potential negative impact on any protected characteristic group. In turn, the outcome of the EQIAs, together with the outcome of the 22/23 Workforce Race Equality Standards (WRES) and Workforce Disability Equality Standards (WDES) determined the ICB's equality, diversity and inclusion activities during 23/24.

Key equalities work included making reasonable adjustments for staff with input from occupational health at all stages of the change programme, a robust and comprehensive Inclusive Recruitment (IR) Programme, opportunity for staff to take voluntary redundancy subject to meeting the eligibility criteria, health and wellbeing webinars and career transition support.

Inclusive Recruitment Programme

One of the key programmes of our equalities work during 2023/24 was the development of an Inclusive Recruitment (IR) Programme to support the requirement of a fair and equitable process throughout the selection processes to fill roles in the new structure at different

stages of the organisational change programme. Over 50 Recruitment Inclusive Advisors - representing all protected characteristics - have been trained and every single interview panel has included an Recruitment Inclusive Advisor to ensure a fair process, with a particular focus on the EQIA outcomes regarding the potential for discrimination. All interview panels following the consultation outcome were required to have a diverse membership of 3 panel members that included the Recruitment Inclusive Adviser. All panel members were required to have completed a three-stage inclusive recruitment training programme before they can partake in the training programme.

Senior leadership development programme

The ICB launched a Senior Leadership Development Programme in March 2024. This year long programme aims to invest in our most senior leaders to support them to navigate leadership in an environment that requires them to create the conditions for cultural change as well as to facilitate innovative systems leadership and thinking.

High Performing Teams Programme

Recognising that high performing teams are the building block of our organisation we have invested in a High Performing Teams programme. This will enable all teams within the new organisational structure to identify new ways of working and support the development of an improved local culture to achieve our organisational objectives. This piece of work has already commenced, with 12 teams completing the programme in March. Phase One of the programme aims to complete in Summer 2024, and from there will be further developed by our OD Team to develop a continuous team development offer.

Mayor of London Workforce Integration Design Lab

To show its commitment to reducing the inequalities that young black men, older black men, black women and Pakistani and Bangladeshi women face within the workplace, the ICB joined the Mayor of London's Workforce Integration Network (WIN). Inclusive leadership remains at the core of our workforce priorities and as part of this network, the ICB also took part in the WIN Design Lab programme, which was a 10-month EDI programme supporting large businesses to tackle the underrepresentation of Black, Asian and Minority Ethnic groups in London's labour market. The work on this programme was linked to the ICB's approach to inclusive recruitment via the Inclusive Recruitment programme that was rolled

out during 23/24. The ICB has been offered continued support as part of the WIN Lab legacy programme and therefore this will continue into 24/25.

In addition, our Chief People Officer has completed a 6-month Anti-Racist Leadership Programme to increase the competence and confidence in tackling racism at an individual, team and organisational level.

Overview of staff engagement and the achievements of the staff networks

The ICB staff networks play a critical and key role to drive and set the equality, diversity and inclusion priorities for the organisation. The staff networks have delivered a programme of activity that has supported staff within the organisation and ensure they feel supported, valued and listened to.

Black, Asian and Minority Ethnic (B.A.M.E) Staff Network

The NCL ICB B.A.M.E Staff Network's purpose is to create an inclusive culture in NCL ICB where staff from B.A.M.E backgrounds feel supported, valued, respected and listened to without fear of discrimination or prejudice, whilst maintaining a belief that career opportunities or experience of work are not predetermined by ethnicity, nationality or colour. There are currently 42 members in the B.A.M.E staff network.

Key achievements during 2023-2024 include:

- Safe space conversations to provide staff with psychological safety to come together and share their lived experiences. The 2022/23 Outcomes Summary Report was discussed at the June 2023 B.A.M.E Staff Network. Due to reduced attendance the Safe Space Conversations will be re-invigorated and promoted across NCL ICB in 2024/2025.
- Black History 365 – the network commenced monthly Black History 365 events in January 2022. Events included a combination of presentations, newsletter articles and events to celebrate B.A.M.E musicians, black classical music, athletes and other famous icons.

- NCL Diversity and Inclusion Book, Film and Music club has been meeting on a regular basis and is run jointly by the B.A.M.E network, Carers, Disability and Long-Term Conditions staff network and the LGBT+ staff network. Following 2 years of successful delivery in the CCG/ICB a project plan and working group was set up to further expand this work across NCL ICS which took place in December 2023. NHSE recently invited NCL ICB to attend a Celebratory Evaluations & EDI Innovations Event as part of the London Workforce Race Strategy (LWRS) on 22nd March 2024 to showcase this work with plans to roll this out across London with commitment from the NHSE Regional Director for London.
- Cultural conversations and events to raise cultural awareness.
- See ME First Campaign – first developed by Whittington Health NHS Trust, the campaign was introduced in NCL CCG and has continued within the ICB. Signing up to the campaign demonstrates commitment to embrace diversity and support and respect each other. 89 staff across the ICB have signed up to the campaign.
- Inclusive Recruitment Advisors have now been part of the NCL ICB interview process since October 2023. The role of the Inclusive Recruitment Advisor is to provide an objective and impartial perspective of the selection process, including supporting with shortlisting and interview panels. This role will play a key part in:
 - Ensuring everyone has a fair and equitable interview.
 - Increase hiring of underrepresented populations in more senior roles to be reflective of the community we serve.
 - Hiring the very best people for the role.
- Celebrating the 75th Anniversary of Windrush & NHS – In recognition of our Windrush Generation and the great contributions made to the NHS, the B.A.M.E. Staff Network had a dedicated intranet page with information and, on 23 June 2023, the ICB Diversity and Inclusion Book, Film & Music Club, had a special Windrush event. NHSE also invited NCL ICB to be part of the NHS Windrush Cruise Event – where two members of staff with family from the Windrush generation In attendance – and the Windrush75: Walk of Witness from Waterloo Station to Southwark Cathedral, where one NCL ICB member of staff attended.
- Black History Month October 2023 ‘Saluting our Sisters’ was held over the month showcases the crucial role that black and brown women have played in shaping history, inspiring change, and building communities – both within our organisation, the

NHS and beyond. There were also presentations by our other Staff Networks highlighting intersectionality.

- Supporting Ramadan in the Workplace Guidance was launched on 6 March, for all staff to support Muslim colleagues who were fasting and for other colleagues who are keen to find out more about the holy month.
- Design Lab 2023 – Anti-racism and EDI – some members of the B.A.M.E. Staff Network have been part of this NCL ICS Workstream, which is led by NCLICB Chief People Officer. The key priorities identified are inclusive recruitment, psychological safety and career progression.
- NCL ICB Change Programme – The B.A.M.E. Staff Network sent a response to the consultation highlighting, based on the proposed restructure, the higher proportion of B.A.M.E. staff who were to be impacted – given they are in a ‘ring-fenced’ pool or considered "at risk" - compared to their overall representation of our white colleagues. We outlined principles to be considered by the organisation to minimise adverse impact on this protected group and demonstrate our commitment to equity, fairness, inclusivity, and equal opportunities.

Carers, Disability and Long-Term Conditions Staff Network

The Carers, Disability and Long-Term Conditions (CDLTC) staff network seeks to raise awareness of disability issues, changing perceptions, so that staff and patients are seen as ‘differently-abled’ rather than disabled. The Network also supports all staff with long-term conditions and those with caring responsibilities, recognising that this can take many forms. This includes staff with caring responsibilities where a formal diagnosis has not yet been confirmed.

Key achievements during 2022-2023 include:

- Safe space conversations to provide staff with psychological safety to come together and share their lived experiences
- Awareness events during History of Disability Month and throughout the year
- Continued promotion of the Workplace Adjustment Passport
- Contributed to the Londonwide HIV Confidential charter

- Supported research into the difficulties carers and people with disabilities or LTCs have in maintaining a healthy work-life balance
- Supported staff through the recent restructure and contributed to EQIAs

NCL ICB staff have provided positive feedback about the work of the network in how it has helped them personally with life experiences, and made them think differently about disabilities in the work that they do:

...‘The sickle cell event really made me stop and think, now when I see someone on the street in summer wearing a coat I think maybe they have sickle cell rather than thinking it is strange or suspicious’

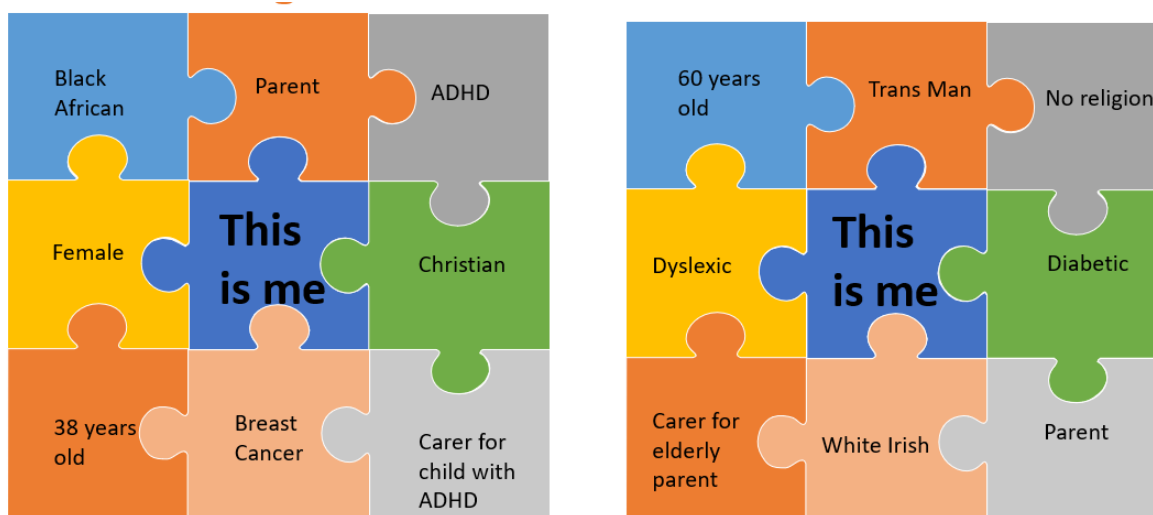
It never occurred to me that there are different communication needs outside of hearing and visual impairment, I need to think about different ways the services need to communicate with patients using symbols and signs for my upcoming procurement

...

‘This safe space had been the most useful support and resource that I have to help with understanding my child’s needs, everyone that has a child with special needs should have a forum like this for support’ ...

...‘The work you do is really inspirational and has given me the confidence to be more open about my own experiences’

The CDLTC network works closely with the other networks to ensure a joined-up approach to inequalities. We seek to understand people as a whole considering the many ways that they may identify be that race, religion, sexual or gender identity or disability/caring responsibility.



They also seek to work with the green network where there are similar areas of concern, for example cleaner air impacts on asthma.

LGBT+ Staff Network

The LGBT+ staff network is instrumental in creating an inclusive culture within the ICB where staff who identify as LGBT+ can feel supported, valued, respected, and listened to. A key part of the network’s work will be to support embedding equality of opportunity in everyday practices such as recruitment, career progression and promotion and provide a fair, equitable, supportive and encouraging working and learning environment for our workforce.

The main aims of the LGBT+ Staff Network are to increase our **visibility**, improve our **safety** and offer **support**. The key achievements during 2023-2024 were:

- We created more **visibility** through the articles we produced in the staff newsletter and the events that we held for things like Pride Month in June 2023 with a supporting article from our CEO and Exec Sponsor; and LGBT+ History Month in February 2024 which included a Queer History Walk, an LGBT+ themed Book, Film and Music Club, and the inaugural episode of ‘Hear Me First’ (a podcast where people tell their own stories in their own words, as part of the See Me First a campaign which holds the belief that ALL people are treated with dignity and respect, and to stand up when you see a colleague being disrespected, discriminated against, bullied, or harassed) based on the lived experience of a gay Doctor working in NCL ICB. We also asked for

equality information held in our staff record to be able to be updated on a quarterly basis in recognition of the gaps in our data on the numbers of LGBT+ staff in NCL ICB.

- We improved our **safety** through the zero tolerance statements from our exec and getting agreement to review our policies from an LGBT+ perspective.
- We offered **support** through our monthly LGBT+ safe space which included support for staff through the ICB transition programmes, discussions on the improvements we want to see in the ICB and planning events.

In addition we have now developed a network of Chairs of LGBT+ Staff Forums in all NCL Health and Care organisations that are partners in the NCL ICS.

Priorities for 2024/25 will continue to focus on the main aims including:

- Growing our staff network and continuing to offer a safe space.
- A focus on the recruitment and retention of LGBT+ staff.
- The review of ICB policies from an LGBT+ perspective.
- Considering how we develop our allies.

Freedom to Speak Up Ambassadors

The ICB has a range of arrangements in place to provide Freedom to Speak Up (FSU) support to staff in relation to their working experience at the ICB – also providing support to North Central London General Practices. These arrangements include providing options to have confidential ‘safe-space’ conversations with FSU colleagues of different gender, ethnicity and banding.

Through 2023/24 the ICB’s Freedom to Speak-Up Guardian and Ambassadors supported a total of 14 confidential conversations with members of ICB staff and from General Practices.

FSU colleagues stay in regular contact to ensure consistency of approach and to provide mutual support, where required. The ICB continues to promote to staff, including during the national speaking-up month in October, the importance of speaking-up and whistleblowing and supporting information on how staff can do this. As part of promoting speaking-up, the

Freedom to Speak-Up Guardian (Ian Porter, Executive Director of Corporate Affairs) meets with new members of staff at the relaunched ICB Corporate Induction events.

Staff are also supported to discuss any concerns, in relation to their work, of a clinical nature with the ICB's Chief Nurse.

The ICB is fully compliant with the requirements of the National Guardian's Office – and the ICB's designated Freedom to Speak-Up Guardian has completed all of the accreditation training.

Our Equality, Diversity & Inclusion Performance

This section of the report sets out the ICB's progress against the following statutory and mandatory reporting requirements in accordance with the Public Sector Equality Duty (PSED):

- Workforce Race Equality Standards (WRES)
- Workforce Disability Equality Standards (WDES)
- Gender Pay Gap
- EDS22
- Equality objectives

Workforce Race Equality Standards (WRES)

This section provides a summary of the ICB's performance against the Workforce Race Equality Standard (WRES) indicators for the period 2023/24. The WRES report is the ICB's second assessment against the WRES indicators since its inception on 1 July 2022.

Our performance against the WRES indicators shows that there has been an improvement in the following areas in comparison to 2023/24:

- ✓ A slight increase in the proportion of staff from a BME background.

- ✓ A slight overall increase in the proportion of staff from a BME background in roles at band 8a – Very Senior Manager (VSM) level.
- ✓ Whilst there continues to be a higher number of staff from a White background at band 8b level, the representation gap at this level has reduced.
- ✓ The relative likelihood of BME staff entering the formal disciplinary process compared to white staff has declined.
- ✓ A reduction in staff from a BME background reporting feeling discrimination from managers, team leaders or colleagues.

In contrast there has been a decline in the following areas:

- The relative likelihood of white staff being appointed from shortlisting compared to BME staff is 5.23 times higher and an increase from 22/23 by 1.06.
- The relative likelihood of white staff accessing non-mandatory training and CPD compared to BME staff has increased.
- A decline in both staff from a white and BME background feeling that the organisation acts fairly with regards to career progression opportunities.

There continues to be a significantly higher proportion of staff that are from a white background than a BME background in roles at Band 8C, 8D, 9 and VSM level.

Please see the full 2023/24 WRES report which includes a more detailed overview of the progress against each indicator, areas the ICB is doing well in and areas the ICB needs to do better in, and key areas of priority that will be progressed as part of this year's workforce plan, with support and input from the BME network.

Workforce Disability Equality Standards (WDES)

This section provides a summary of the ICB's performance against the Workforce Disability Equality Standards (WDES) indicators for the period 23/24. The WDES report is the ICB's second assessment against the WDES indicators since its inception on 1 July 2022.

Our performance against the WDES indicators shows that there has been an improvement in the following areas in comparison to 23/24:

- ✓ An increase in the number of staff that have confirmed whether they do/don't have a disability and a reduction in the number of staff that chose not to declare a disability (16% to 8%) to show more accurate representation of the profile of the workforce.

In contrast there has been a decline in the following areas:

- The relative likelihood of non-disabled applicants being appointed from shortlisting compared to disabled staff is 1.1 times higher (increased by 0.42 times).
- The percentage of staff that experienced harassment, bullying or abuse from patients, managers or colleagues is higher for disabled staff/staff with a long-term condition.
- A decline in staff engagement from both staff with a long-term condition and no long-term condition.
- A decline in the percentage of staff that feel the organisation has made adequate adjustments to enable them to carry out their work.
- A decline in the percentage of both disabled and non-disabled staff that feel the organisation acts fairly with regard to career progression / promotion, regardless of ethnic background, gender, religion, sexual orientation, disability or age.
- An increase in the percentage of disabled staff compared to non-disabled staff saying that they have felt pressure from their manager to come to work, despite not feeling well enough to perform their duties.
- A decline in both disabled and non-disabled staff that feel the organisation values their work.

Please see the full 2023/24 WDES report which includes a more detailed overview of the progress against each indicator, areas the ICB is doing well in and areas the ICB needs to do better in, and key areas of priority that will be progressed as part of this year's workforce plan, with support and input from the Carers, Disability and Long Term Conditions Network.

Gender Pay Gap

The gender pay gap is a measure that shows the difference in average earnings between men and women within an organisation and it should not be confused with equal pay. The gender pay gap is the difference between the hourly rate of pay of male employees and female employees. This is expressed as a percentage of the hourly pay rate of the male employees.

The gender pay gap is different from equal pay and is not a measure of equal pay.

The **mean gender pay gap** is defined as the difference between the pay of all male and female employees when added up separately and divided respectively by the total number of males, and the total number of females in the workforce. The mean gender pay gap for the ICB on 31 March 2024 is 6.8%. The office of national statistics reported the UK national mean gender pay gap in April 2023 as 7.7%². The ICB mean gender pay gap is 0.9% below the national mean gender pay gap. The mean gender pay gap on 31 March 2024 is 0.12% less than the gender pay gap at 31 March 2023 which was 7%.

The **median gender pay gap** is defined as the difference between the pay of the middle male and middle female when all male employees and all female employees are listed from the highest to the lowest paid. The median gender pay gap for the ICB on 31 March 2024 is 9.83%. The office of national statistics reported the UK national median gender pay gap in April 2023 as 14.4%¹. The ICB median gender pay gap is 4.57% below the national median gender pay gap.

Please see the full ICB Gender Pay Gap report which includes further details of the gender pay gap measures and key areas of priority that will be progressed as part of this year's workforce plan with support and input from the newly formed Women's Network.

Equality Delivery System (EDS) 2022

The Equality Delivery System (EDS) is a system that helps NHS organisations improve the services they provide for their local communities and provide better working environments, free of discrimination, for those who work in the NHS, while meeting the requirements of the Equality Act 2010. The EDS was developed by the NHS, for the NHS, taking inspiration from existing work and good practice. It originally comprised of 14 objectives addressing equality on a colleague and service user level that had to be evaluated every three years by a group of colleagues and stakeholders.

² [Gender pay gap in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

EDS underwent an update in 2022 and became EDS2022. It now comprises three Domains and 11 objectives. Domain 1 considers patients and local communities and comprises 4 objectives to assess how inclusive the organisation is for patients. The two service areas that were used as case studies for assessment were Inclusion Health and Sickle Cell. Domain 2 considers the workforce and comprises 4 objectives to assess how inclusive the organisation is for its workforce. The areas of assessment include workforce, health and wellbeing, including support to manage conditions such as obesity, diabetes, asthma, COPD and mental health conditions; staff experience of bullying, harassment and physical violence, and the access to support in these areas; and the recommendation of the organisation as a place to work. Domain 3 considers the Board leadership and comprises 3 objectives to assess Board leadership inclusion in areas including their understanding and commitment to equality and health inequalities, and risk and performance management in these areas.

To meet the mandated requirements for 2023/24 we undertook a series of engagement events between August 2023 to February 2024 with staff, including staff networks, trade union representatives and patients to explore and obtain their input and feedback on how the ICB has been performing against all 11 EDS2022 objectives.

The overall EDS grading outcome of the organisation is at the **'Developing Activity'** stage. The majority of the EDS grading outcomes for the activities and objectives under domain 1 were assessed as **'Achieving'** or **'Excelling'**.

The majority of the EDS grading outcomes for the activities and objectives under domains 2 and 3 regarding workforce were assessed as **'Achieving'**, **'Developing'** and one area within domain 2 (recommending the organisation as a place to work) was assessed as **'under achieved'**. The areas under domain 2 and 3 will be further developed as part of phase 2 of the OD plan within the 2 pillars of Support, Compassion and Wellbeing, equity and diversity and learning and innovation.

Please see the full EDS2022 report for further information.

23/24 Equality Objectives

In 22/23 the following two objectives were set for 23/24 that were relevant at that point in time:

1. To develop a culture of equity, positive diversity and comprehensive inclusion for all, where staff can bring their whole selves to work safe in the knowledge they will be valued and respected.
2. Managing the ICB change programme in a fair and equitable way that values diversity and inclusion, recruits, retains and attracts a diverse range of employees.

The two objectives were underpinned with the following actions:

Objective 1: To develop a culture of equity, positive diversity and comprehensive inclusion for all, where staff can bring their whole selves to work safe in the knowledge they will be valued and respected	
Actions	Embed and maintain EQIA approach, best practice and learning
	Further promote and embed the NCL Workplace Reasonable Adjustment Passport and guidance for managers
	Review support and development of Staff Networks including formal links into ICB governance arrangements
	Ensure staff network chairs have dedicated time allocated to support the networks
	Deliver and continuously improve the support and development of networks
	Scope and assess the requirements for implementing a programme to enable the ICB to be an anti-racist organisation and to tackle inequality
	Design and launch a programme to enable the ICB to be an anti-racist organisation and to tackle inequality
	Review management and oversight of local investigation and disciplinary procedures in line with the 7 recommendations outlined in a Fair Experience for All

Objective 2: Managing the ICB change programme in a fair and equitable way that values diversity and inclusion, recruits, retains and attracts a diverse range of employees	
Act ion	Review and refresh the ICB values and develop a competency and behaviours framework aligned to the NHS Culture and Leadership programme that will champion an inclusive and compassionate leadership framework.

	Utilise the ICB competency and behaviours framework to underpin the selection processes for managerial/leadership roles and form part of the appraisal objectives for managers/leaders.
	Provide career transition support for staff affected by change
	All recruitment panel members that will partake on selection panels will be required to attend inclusive recruitment training
	All managers will be required to attend a diversity and inclusion awareness workshop before the outcome of the consultation
	All recruitment selection panels will be made up of a diverse membership
	The chair of the selection panel must provide a rationale and feedback regarding any staff with a declared protected characteristic not being appointed to a role, that will be shared with the Chief Executive Officer and Chief People Officer.
	Offer and accommodate reasonable adjustments for staff on long term leave, with a disability, long term conditions or carer commitments

With regards to the actions under objective 1, the majority of these are in progress because the delivery date for these has been revised to 24/25 when we were better placed to engage with staff networks and staff to co-deliver the programmes of work under this objective. This objective and actions will roll-over to 24/25.

The majority of the actions under objective 2 have been met because these relate to the change programme. Whilst the inclusive recruitment processes we put in place supported the internal selection processes in accordance with the change management policy, it is recognised that the inclusive recruitment programme of work hasn't yielded the results in attracting/appointing a more diverse range of individuals and therefore we will look to strengthen this area during 24/25. Those activities requiring co-design with staff for example the values and behaviours framework will be delivered during 24/25.

23/24 Key EDI Themes and Trends

The staff survey results and assessment against several EDI areas show that whilst the ICB has seen some improvement in several areas including line management support, working with colleagues, Disability status representation, BME staff representation, including at senior levels and a decline in the relative likelihood of BME staff entering formal processes in

comparison to white staff, our data shows there are several key themes and trends that need significant improvement so that our staff have better experiences in these areas.

It was disappointing to see that the ICB's performance against many of the WRES and WDES indicators have declined over the past year, particularly the standards relating to recruitment, particularly because the inclusive recruitment programme that was undertaken by the ICB to strengthen fairer and equitable recruitment practices mirror the approaches taken by NHS other organisations.

It is important to note the following information regarding the data that has been used to determine the ICB's performance against the EDI standards:

- The ICB advertised very few posts via open recruitment over the past year (18% of the data sample analysed in 23/24) and the posts that were advertised were very senior and/or specialist posts.
- Most of the posts in the new structure were filled via the internal processes in accordance with the Change Management Policy. This in turn affects how staff feel about access to career development opportunities.
- The disability representation data in comparison to 22/23 has significantly changed with more staff declaring their status and a reduction in the proportion of staff declaring the 'not stated' status. Whilst this change represents staff feeling safer to declare their status, this will impact our performance against the WDES indicators when comparing to last year.
- Most of the learning and development training programmes centred around the organisational change programme with a focus on training for managers to lead change and inclusive recruitment. With our data showing more staff from a White background in more senior managerial roles, this group of staff would have had more access to training than BME staff.

Many of the areas of our EDI performance for example those relating to access to career progression, learning and development opportunities and experiences of bullying and harassment also correlate to a decline at an organisational level. In turn, there are clearly some areas that we need to pay greater attention and focus to over the coming year with engagement and input from our staff networks and right external expert support, in particular

the support for staff with long-term conditions and improving the likelihood of individuals with a BME background/ a disability or long-term condition being appointed from the shortlisting stage.

The key areas of improvement identified from equality and inclusion performance indicators include:

- Support with reasonable adjustments at work, particularly for staff with a long-term condition/disability.
- The need for well-being conversations at a local level.
- Greater support provisions for staff with long term conditions including mental health, diabetes, COPD and stress.
- Access to learning and development opportunities, including non-mandatory training for staff at all levels, in both clinical and professional roles.
- Fairer access to career progression opportunities.
- High quality appraisal discussions with an emphasis on career and wellbeing conversations.
- The need to improve the relative likelihood of individuals with a BME background/ a disability or long-term condition being appointed from the shortlisting stage.
- Bullying and harassment behaviours experienced by staff.
- Communication and engagement of the OD plan action plan and initiatives.

Recognising the significant improvement that needs to be made in this area to create better experiences for our staff we will look to develop specific and tangible actions and set targets in line with the NHS Equality, Diversity and Inclusion improvement plan and develop an anti-racist programme in line with the regional framework and with engagement and input from the staff networks. It will be important for these programmes of work to be managed as a golden thread to the other areas of priority identified. The ICB plan to get more expert external support to improve inclusive practices in these areas within the organisation.

Health, Wellbeing and Compassion

Both the 2023 staff survey results and the ICB's WDES performance on the reasonable adjustments that need to be made to support staff demonstrate that the ICB need to do more to provide the right **compassion and wellbeing support** for staff and this is supported by the outcome of the EDS22 assessment in domain 2 (workforce, health and well-being) and the support provided to staff to support and manage obesity, diabetes, asthma and mental health conditions, and the access to support in situations where staff are suffering from stress, abuse, bullying and harassment.

There will be a change in occupational health (OH) and employee assistance programme (EAP) service provider and the OH and EAP service offer to staff will be informed by the outcome of the survey. It is also important to note that this is the first year that data on sexual safety in the workplace has been collated from the staff survey. 2% of staff that completed the staff survey have reported that they have experienced unwanted behaviour of a sexual nature.

These outcomes have shaped the priorities that have been set for 24/25 in the area of health, wellbeing and compassion that will be co-designed and rolled out with support from the Carers, Disability and Long-Term conditions staff network. Key areas of work include a **health and wellbeing survey** so that further details of the areas of focus regarding health and wellbeing can be identified that will meet the needs of our staff; a refresh and co-design of the **workplace adjustment passport**, signing up to national **NHS England sexual safety charter** and setting up a working group to develop and deliver a programme of work that will deliver the actions that underpin the charter. **Health and wellbeing conversations** will also become integral to the appraisal and performance review process. To address areas of the staff survey and the feedback from the EDS22 assessment, the ICB will also develop an approach to **supervision for staff in roles that carry an emotional burden**.

24/25 EDI workforce priorities

The phase 2 action plan has been informed by the key trends, ICB's performance in equality, diversity and inclusion and workforce performance data as set out in the People & Culture Annual Report.

- ✓ Redesigning and relaunching our **Values and Behaviours framework** with staff and staff networks, including **civility and respect** that will determine the acceptable and unacceptable behaviours and place a strong emphasis on the types of behaviour that create a more inclusive and psychologically safe environment, to enable all our staff to thrive in a safe inclusive environment.
- ✓ Strengthen approach to **inclusive recruitment practices** through debiasing recruitment and the diverse panels.
- ✓ Develop an approach to **supervision for roles** that take an emotional burden
- ✓ A **health and wellbeing** survey to revise, promote and deliver health and wellbeing offer to respond to survey and in line with national guidance and aligned with system arrangements.
- ✓ Work with the carers, Disabilities and Long-Term Conditions network to refresh, promote and embed the NCL **Workplace Adjustment Passport** and guidance for managers.
- ✓ Design and launch a programme to enable the ICB to be an **anti-racist organisation** and to tackle inequality.
- ✓ Review **support and development of Staff Networks** including formal links into ICB governance arrangements, access to funding and staff network chairs are provided with dedicated time to support the networks.
- ✓ Roll out of a **learning and development programme** that will give all staff access to clinical and professional development and greater non-mandatory training in a way that is equitable and takes into account their individual needs and objectives.
- ✓ Re-design of the **appraisal and personal development (PDR) process** to better align with the ICB's business planning cycle, objectives and values and behaviours framework.
- ✓ Refresh and continue the **core skills for managers programme**.

- ✓ Roll out of **leadership competency framework** and Directors **senior leadership development programme**
- ✓ Continuation of the **High Performing Teams programme**.
- ✓ Sign up to the **national sexual safety charter** and develop working group and plan to meet the underpinning actions.
- ✓ Re-design and roll out **corporate and local induction** for new starters (staff and managers) to reflect vision and values and create an interactive experience.
- ✓ Overhaul HR **Policies and procedures in line with Fair Experience for All** and **Just and Restorative practice** and review employee relations reporting arrangements to include any trends in variation, themes and disparity.
- ✓ To successfully **stand-up the new People and Culture Directorate** to embed the new structure and develop the function in line with the national people digital strategy.
- ✓ Development of **#inclusive HR programme** to strengthen inclusivity within the ICB people function.
- ✓ Build on the professional skills and capabilities within the team in accordance with the **NHS Futures programme for HR and OD professionals**, alongside the **People Services Digital strategy**, automation, artificial intelligence remote working, staff wellbeing, care quality and retention.
- ✓ Continue **Zero Touch HR Artificial Intelligence (AI) automation platform** that empowers automated self-service actions and answers.
- ✓ Develop and roll out **standard operating procedures** to set out how the People Services team will operate, and the roles and responsibilities of key stakeholders regarding people management processes.

Recognising the ICB needs to significantly improve the equality, diversity and inclusion performance in some key areas, the equity and inclusion part of the ICB's phase 2 action plan will now move beyond the scope of the initial 3-year OD plan in this area. The ICB will get more expert external support to improve practices in our approach to inclusive recruitment and further closing the gender gap, particularly at senior levels.

The ICB will look to develop an EDI programme with specific and tangible actions and set targets in line with the **NHS Equality, Diversity and Inclusion (EDI) improvement plan**³ with engagement and input from the staff networks, People & Culture Oversight Group, Trade Unions and external expert support.

The EDI improvement plan sets out targeted actions to address the prejudice and discrimination (both direct and indirect) through behaviour, policies practices and cultures and will focus on the following key areas:

- Board and Executive Management Teams to have EDI objectives that must be assessed as part of the annual appraisal process.
- Embed fair and inclusive recruitment processes and talent management strategies that target under-representation and lack of diversity.
- Develop and implement an improvement plan to address gender, ethnicity and disability pay gaps
- Develop and implement an improvement plan to address health inequalities within the workforce.
- Create an environment that eliminates the conditions in which bullying, discrimination, harassment and physical violence at work occur.

The North London Partners Shared Service (NLPSS) provide a recruitment service to many of the NHS organisations across the North Central London. NLPSS recently undertook an inclusivity audit and will be taking forward recommendations to strengthen inclusive recruitment. The ICB is planning to join NLPSS in early 2025 and will be able to take forward these recommendations as part of our EDI programme.

24/24 Equality objectives

The two objectives that have been set for 24/25 align with the workforce priorities identified in the above section, with one objective aligning to the NHS EDI improvement plan:

³ [NHS equality, diversity, and inclusion improvement plan \(england.nhs.uk\)](https://www.england.nhs.uk/equality-diversity-and-inclusion-improvement-plan/)

Objective 1: To develop a culture of equity, positive diversity and comprehensive inclusion for all, where staff can bring their whole selves to work safe in the knowledge they will be valued and respected

Actions	Redesigning and relaunching our Values and Behaviours framework with staff and staff networks
	Strengthen approach to inclusive recruitment practices through debiasing recruitment and the diverse panels
	A health and wellbeing survey to revise, promote and deliver health and wellbeing offer
	Work with the carers, Disabilities and Long-Term Conditions network to refresh, promote and embed the NCL Workplace Adjustment Passport and guidance for managers.
	Design and launch a programme to enable the ICB to be an anti-racist organisation and to tackle inequality.
	Review support and development of Staff Networks including formal links into ICB governance arrangements, access to funding and staff network chairs are provided with dedicated time to support the networks.
	Sign up to the national sexual safety charter and develop working group and plan to meet the underpinning actions.
	Overhaul HR Policies and procedures in line with Fair Experience for All and Just and Restorative practice.
	Development of #inclusive HR programme to strengthen inclusivity within the ICB people function.

Objective 2: To develop and deliver an EDI improvement plan in accordance with the NHSE EDI improvement plan that will address discrimination, increase accountability of all leaders, support the levelling up agenda and make opportunities for progression equitable

Actions	Board and Executive Management Teams to have EDI objectives that must be assessed as part of the annual appraisal process.
	Embed fair and inclusive recruitment processes and talent management strategies that target under-representation and lack of diversity.
	Develop and implement an improvement plan to address gender, ethnicity and disability pay gaps
	Develop and implement an improvement plan to address health inequalities within the workforce.
	Create an environment that eliminates the conditions in which bullying, discrimination, harassment and physical violence at work occur.

Measuring success

A range of measures building on the current methods are proposed to evaluate and monitor the success and impact of the NCL OD Plan, including:

- NHS Staff Survey and local surveys and pulse checks
- WRES, WDES, EDS 2022 and Gender Pay Gap data and reports.
- Workforce Performance data and reports
- Results from staff network questionnaires and safe space conversations

Next Steps

The people function will:

- Launch and promote the phase 2 plan through a variety of communication channels and throughout the organisation to raise awareness, gain commitment and engage staff in its delivery.
- Develop the key workstreams for delivery as part of a programme plan that will identify key leads, roles and responsibilities at a senior leadership and directorate level.
- Develop a EDI programme plan with engagement and input from the staff networks, People & Culture Oversight Group, Trade Unions and external expert support.

The delivery and impact of the workforce programme plan will be monitored and reported to the People and Culture Oversight Group (PCOG) and Executive Management Team (EMT).