

**GLOUCESTERSHIRE PARTNERSHIP NHS TRUST
GENDER EQUALITY ACTION PLAN**

OBJECTIVE	ACTIONS	LEAD RESPONSIBILITY / TIME SCALES	PROGRESS TO DATE
YEAR ONE – Identify what we know and where we are			
FUNCTIONS AND POLICIES			
Assess all Trust functions and policies against the requirement to:			
<ul style="list-style-type: none"> • Eliminate discrimination and harassment that is unlawful under the Sex Discrimination Act (SDA) 1975 • Eliminate discrimination that is unlawful under the Equal Pay Act 1970 (EqPA) • Promote equality of opportunity between men and women • 	Develop a systematic approach of using impact assessments with training, support and feedback to aid identification and elimination of discrimination in the development and delivery of services	Carol Sparks April 2007	Template developed and agreed (see Appendix 2). Core group of managers trained to use template Completed but may have on-going need to train managers
	Ensure that impact assessments are used as part of service re-design for assessing policies and processes	Programme managers April 2007	Trained managers using template as part of service re-design April 2007
	'Impact assess' all existing policies and procedures at review date / in priority order; and when new policies and procedures are being developed.	Carol Sparks / HR Managers - HR policies and procedures Vikki Tweddle - Clinical policies and procedures Val Watson – Safety Gordon Benson – Administrative November 2006 onwards	Work has commenced on Priority 1 policies and procedures (see timetable of work appendix 2) April 2007
	Ensure appropriate staff are familiar with and can undertake impact assessments as needed	Carol Sparks / Errol Bryan April 2007	Core group of managers trained to use template April 2007
	A timetable for the review of policies, procedures and functions will be developed as an appendix to this action plan. The timetable will prioritise the work to be done and include dates for monitoring progress.	Kay Harrison Completed	Timetable developed and agreed (see appendix 2) Completed
	Publish the Gender Equality Scheme, the supporting action plan and results of gender equality impact assessments on the Trust's internet webpage and intranet	Carol Sparks / Deborah Richards April 2007 onwards	Diversity web page available via internet and intranet. Diversity Steering Group to consider Gender Equality Scheme and Action Plan March 2007

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EMPLOYMENT			
Review the Trust's employment practices in the light of the requirements to:			
<ul style="list-style-type: none"> • Eliminate discrimination and harassment that is unlawful under the Sex Discrimination Act (SDA) 1975 • Eliminate discrimination that is unlawful under the Equal Pay Act 1970 (EqPA) • Promote equality of opportunity between men and women 	Monitor by reference to gender at/for: <ul style="list-style-type: none"> • Recruitment • Development • Retention • Flexible working • Occupational segregations • Management of Change • Retirement • Equal pay • During pregnancy or on return from maternity leave • Accessing carer leave or taking on carer responsibilities 	Kevin Jacobs / Carol Sparks Annual reports to Diversity Steering Group	Data available from ESR
	Re-assess how representative the Trust's workforce is by comparing the staff profile with the profile of the population it serves	Kevin Jacobs / Carol Sparks September 2007	
	Ensure that the monitoring results are regularly considered by the Diversity Steering Group and Workforce Committee as appropriate. Identify issues, and gaps; make recommendations as to appropriate action through the involvement and consultation of disabled people (see Involvement and Communication)	Kevin Jacobs / Carol Sparks Annual reports commencing September 2007	
	Publish the monitoring results on the Trust's internet website.	Carol Sparks / Deborah Richards April 2008 and annually thereafter	
	Specifically the Trust's 'Dignity at Work' procedure will be reviewed to ensure that it is compliant with the general and specific duties	Kay Harrison Completed	Completed

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	Existing procedures and support mechanisms for staff will be reviewed to ensure that these meet the specified duties	Carol Sparks June 2007	
	Review existing criteria for training to ensure that barriers are removed and monitor progress	Sue Heafield March 2007	
	Review the need for appropriate training in 'equality' issues	Sue Heafield March 2007	
	Ensure that training and development opportunities are published and can be accessed by all staff regardless of disability	Sue Heafield March 2007	
	Ensure that appraisal and personal development plans are in place for all staff	All Directors September 2007	
	The Trust will review opportunities for flexible working at all levels within the organisation	Carol Sparks April 2008	

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SERVICES			
Develop services and supporting clinical policies, procedures and protocols which effectively address the respective needs of women and men and trans-sexual people	A systematic approach of using impact assessments with training, support and feedback will be developed to aid identification and elimination of discrimination (including sexual discrimination) in the development and delivery of services	Director of Human Resources / Diversity Project Manager April 2007	Template developed and agreed Core group of managers trained to use template Completed
	A review will be undertaken of existing policies / procedures and mechanisms which are or should be in place to eliminate the discrimination or harassment (including sexual discrimination) of service users by staff, by each other or others with whom they may have contact whilst accessing our services.	Ted Quinn / Linda Folley April 2007 onwards	
	The Trust's Gender Equality Action Plan will set out a timetable for the review of services, seek to identify existing or potential discrimination, (including sexual discrimination) prioritise the work to be done and monitor progress.	Ted Quinn / Linda Folley April 2007 onwards	
	Consider available research to inform priorities and actions, and identify areas where it should work with other service providers to improve the access of users appropriate to need not based on gender	Ted Quinn / Linda Folley June 2007	
	To audit buildings and premises identifying areas which require adaptation or modification	Judith Morris October 2007	
	To audit of equipment and facilities identifying areas which require adaptation or modification	Judith Morris October 2007	
	Cost and prioritise work to be done	Judith Morris October 2007	

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	Have in place a process for capturing and responding to complaints or concerns re premises and facilities	Judith Morris October 2007	
Where the Trust commissions care from other voluntary, statutory or independent contractors, it will assure itself that these contractors will have in place proper procedures to monitor and eliminate harassment.	A timetable will be developed to review the commissioning / procurement processes and address any issues arising.	Judith Morris October 2007	

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COMMUNICATION			
Effectively communicate the Trust's approach to the Gender Equality Duty	Communication will use language which does not stereotype by gender.	Carol Sparks / Deborah Richards April 2007 onwards	
	Style, format and content of the action plan will be developed to reflect feedback from consultation with identified groups	Carol Sparks April 2008 as part of annual review	
	where specific representation and feedback cannot be acted on, the Trust will be clear as to the reasons for taking different or no action.	Carol Sparks April 2008 as part of annual review	
	The objectives set out in the Gender Equality Scheme will be reviewed on an annual basis with the intention of achieving those objectives by April 2010. Where it is not possible to do so, the Trust will be explicit as to the barriers faced and alternative approaches it will consider and over what time period.	Carol Sparks April 2008 as part of annual review	
	Review the Gender Equality scheme every 3 years	Carol Sparks April 2010	
	The Action Plan will be published alongside the Gender Equality Scheme and will be accessible to Trust staff, prospective applicants, service users and the general public.	Carol Sparks / Deborah Richards April 2007	

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CONSULTATION			
The Trust will identify groups and networks with which consultation should take place for the development of the Scheme and in the development of the supporting action plan	Identify existing networks and groups who can be involved with the development of a detailed action plan	Carol Sparks April 2007 onwards	
	Style, format and content of the action plan will be developed to reflect feedback from consultation with identified groups	Carol Sparks April 2008 as part of annual review	
	Identify other groups / meetings / organisations that can offer expert advice and involvement for the development of a comprehensive and relevant action plan	Carol Sparks April 2007 onwards	
	Update the Gender Equality Scheme to reflect the level of consultation, frequency, with what groups or individuals and the impact the involvement has had on decision making, setting targets, prioritising the work and achieving outcomes	Carol Sparks April 2007 onwards	

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GATHERING INFORMATION			
The Trust will access national information, national policy frameworks, existing national research, information available locally and from within the Trust.	A range of methods for data capture will be identified	Ryan Lewis / Carol Sparks / Kevin Jacobs April 2007 onwards	
	The Diversity Steering Group will assure itself that the methods of data capture and the use of gathered information is both appropriate and relevant for the purpose outlined	Ryan Lewis / Carol Sparks / Kevin Jacobs April 2007 onwards	
	The Trust will develop a range of local indicators which will help inform actions, outcomes and targets which will be reviewed on an annual basis	Ryan Lewis / Carol Sparks / Kevin Jacobs April 2007 onwards	
YEAR TWO – Set targets and tangible outcomes to be achieved; monitor progress			
YEAR THREE – Assess progress against targets; review and update action plan			

Template for Equality Impact Assessment of Policies and procedures.

This template is designed to support the process of conducting an Impact Assessment and is based upon guidelines produced by the Commission for Racial Equality (see: http://www.cre.gov.uk/duty/reia/how_stage2.html)

Policy under review:	Date of assessment:	Assessed by:
Consider:	Assessment: Please see guidance	Action to be taken:
What are the aims of the policy?		
Is there any evidence that some groups could be adversely affected? If there is which groups are affected? Is there any evidence of higher or lower participation or uptake by different groups? Is there any evidence that different groups have different needs, experiences, issues and priorities?		
What would be the likely impact of the policy?		
Consider:	Assessment: Please see guidance on page 8	Action to be taken:
Should the policy under review be altered so as to provide an opportunity to promote equality of opportunity or good race relations?		
What consultation is necessary?		
Should the policy be adopted? Keep a record of the conclusions at each stage of the decision-making process, so that they can be brought together in the equality impact		

<p>assessment report.</p> <p>The report should contain reasons for decisions made and recommendations as to how the policy will be put into practice, including suggestions for training and monitoring</p> <p>The report should also clearly show the relative weight given to each type of evidence:</p> <ul style="list-style-type: none"> ▪ monitoring data ▪ research findings ▪ other statistics ▪ the results of consultations (formal and informal). 		
<p>What monitoring arrangements are necessary?</p>		
<p>How will the results of consultations and assessments be published?</p> <p>The specific duty to produce and publish a Gender Equality Scheme requires that the results of assessments and consultations carried out in respect of any policy is relevant to the gender equality duty must be published</p>		

What are the aims of the policy?

What specific responsibilities does the Trust have in relation to the policy being assessed?

Where does responsibility for the proposed policy finally rest?

How will the policy be put into effect and who will be responsible for it?

To what extent might the policy achieve equal opportunities and good relations between different groups?

What specific outcomes could the Trust hope to see from the policy?

What criteria will be used to measure progress towards the outcomes?

Are there any risks associated with the policy, particularly for meeting the equality duty?

How does the policy fit in with other policies?

Is the overall purpose of the policy compatible with the Trust's equality and diversity policy?

Which individuals and organisations are likely to have an interest in the policy?

Do the stakeholders include representatives from all the groups likely to be affected by the policy?

What relationships does the Trust have, or need to have with these stakeholders, if the policy is to be credible and have their support?

Would there be any benefit involving other organisations with similar policies in the assessment process so as to benefit from their experience, and avoid duplicating work they might have already done?

Is there any evidence that some groups could be adversely affected? If there is which groups are affected?

Is there any evidence of higher or lower participation or uptake by different groups?

Is there any evidence that different groups have different needs, experiences, issues and priorities?

What sort of information will the Trust need to develop an effective policy that benefits all groups equally?

What quantitative and qualitative is already available within the Trust, for example historical, demographic and other statistical data including census data.

What equalities monitoring data is available?

Would other organisations with similar policies be able to advise as to the information they found useful?

Would comparisons with similar policies in other public sector organisations particularly but not exclusively organisations in the health community be useful?

Is the available information up to date, relevant and reliable?

Does the available information need to be supplemented through new research, or specially commissioned qualitative or quantitative surveys, or consultation exercises?

Are there any other organisations that might also want to commission new data or research or consultation exercises?

What would be the likely impact of the policy?

Does analysis of the information show that the disparities between groups are statistically significant and not the result of chance?

If so consider whether they could be explained by other factors.

If not, or if equalities plays an important part in the explanation review the policy or the proposed policy and consider other options, including measures to mitigate the adverse impact.

Could the policy lead to unlawful direct discrimination?

If it could it must be abandoned and different ways of achieving the policy's aims must be identified.

Could the proposed policy lead to unlawful indirect discrimination?

If it could then different ways of achieving the policy's aims should be identified.

If the policy's potential for indirectly discriminating against some groups is justifiable, the reasons must have nothing to do with race and legal advice on the question of justifiability should be sought.

Could the policy damage relations between the Trust and particular groups?

Could the policy be in breach of other legislation?

Is the policy intended to increase equality of opportunity for some groups, for example, by taking advantage of the positive action provisions of the Race Relations Amendment Act?

Is the policy lawful, and can it be justified?

Will steps need to be taken to counter any resentment the policy might cause amongst other groups?

Has the policy been re assessed? If it has had substantive changes been made to the original proposal?

Have the results of the assessment been discussed with stakeholders?

Does an informal consultation exercise, internally or externally, need to be held at this stage?

Would further research be useful and would this be a proportionate response to the policy in terms of its importance?

Should the policy under review be altered so as to provide an opportunity to promote equality of opportunity or good race relations?

Does the assessment show that the policy could have an adverse impact on some groups?

If so, the aims and purpose of the policy should be re examined and the approach reconsidered.

Are there aspects to the policy that could be changed, or could additional measures be taken, to reduce or remove adverse impact on a particular group, without affecting the policy's overall aims?

Could this unintentionally result in disadvantaging another group? Would you be able to justify this, on balance?

How does each policy option advance or hinder equality of opportunity?

Could the policy lead to tensions between groups?

If it could, is this because its purpose is to take advantage of provisions in the law that permit discrimination in order to tackle under-representation, or to meet the needs of a particular group?

Are there steps that could be taken to reduce tensions, resentment or misunderstanding, by explaining the aims of the policy and showing that its intention is to tackle inequalities and not create them?

Will the social and economic costs or benefits to the group(s) in question outweigh the costs to the Trust or to other groups?

What are the net social benefits of implementing each option?

What consultation is necessary?

Have all the groups likely to be affected by the proposed policy, whether directly and indirectly been identified?

Which organisations and individuals are likely to have a legitimate interest in the policy?

What methods of consultation are most likely to succeed in attracting the people to be consulted?

Have other departments or authorities held formal consultations on similar policies?

If they have, are the results relevant and are they still up to date?

If they are relevant and up to date consider whether other methods of consultation might get particular sections of the population more involved, for example by holding separate meeting for particular communities, and also for groups within these communities, such as young people, older people, women, men, transsexual people, single parents, divorced and separated women, people with disabilities, Gypsies and Travellers, and new migrants, including asylum seekers and refugees.

Has the Trust's Staff Side organisation been consulted?

Have external advisory groups been asked to carry out consultations in their sectors or areas of expertise?

Is it possible to use the knowledge and experience of 'community representatives' to set up direct consultation exercises with different sections of the communities they represent?

Have previous attempts to consult particular communities been unsuccessful?

If they have, what are the reasons and what can be done to overcome any obstacles?

Are resources available to encourage full participation by groups that have proved hard to reach?

Will proposed consultation events coincide with religious customs or festivals?

How will information, pre- and post-consultation, be made available?

Have arrangements been to translate the consultation material, the publicity material for the consultation, and have interpreters been arranged to attend consultation events?

Should the policy be adopted?

Does the assessment show that the policy will have an adverse impact on a particular group (or groups)?

Is the proposal likely to make it difficult to promote equal opportunities or good relations between different groups?

If the answer to both these questions is 'yes', can the policy be revised, or can additional measures be taken, so that it achieves its aims, but without risking any adverse impact?

What are the main findings of any consultations, and what weight should they carry?

What weight should be given to other evidence?

Who will be involved in the decision-making process?

How will the decision-making process be structured, and how will the decisions be recorded?

Is the policy directly discriminatory in any of the areas covered by the Sex Discrimination Act or the Equal Pay Act or other Equalities Legislation (that is, it would lead to people from a particular group(s) being treated less favourably than people from other groups)? If it is it will be unlawful and should be rejected straightaway.

Will the policy indirectly discriminate (that is, it would it disadvantage people from some groups)? If it will it may need to be rejected unless it can be justified.

What monitoring arrangements are necessary?

Should the policy be piloted, to see how it actually affects people, depending on their group?

How will the results of the pilot be taken into account before the policy is finally adopted and launched?

How will the policy be monitored once it becomes operational?

What sort of data will be collected and how often will it be analysed?

Will the monitoring include qualitative methods, such as surveys, or follow-up consultations?

Who will be responsible for the monitoring?

How will the effects of the policy on equality of opportunity and good race relations be monitored?

What criteria will be used to assess these?

How will any concerns be taken into account in any review of the policy?

How often will the policy be reviewed, and who will be responsible for this?

Has a formal monitoring programme been drawn up, to make sure the entire process is followed through systematically, and within a realistic timetable?

How will the results of consultations and assessments be published?

Does the report contain a description and explanation of the proposed policy, putting it in its wider policy and legislative context?

Is there an explanation of how the policy was assessed for its likely effects on different groups with clear references to the information and research used as a benchmark?

Does the report contain description of the consultation methods used, and a summary of the overall findings?

Would brief summary reports on the impact assessments and consultations that have been carried out be appropriate?

Where will the report or the brief summary be published: in the annual report, on the Trust's website or in the Trust's newsletter?

Will the published report be readily available to anyone who wants a copy?

Have arrangements been made for providing translations in languages other than English, including Braille, and specially formatted versions and audio tapes, on request.

HEALTH AND SAFETY – PRIORITISATION FOR REVIEW

Name of Policy	Timetable for Review
Priority 1	
Equipment Management	
Fire	
Handling & Moving	
Health & Safety	
Preventing and responding to aggression and violence	
Work related stress	

Name of Policy	Timetable for Review
Priority 2	
Display Screen Equipment (priority 2/3)	
Lone Workers	

Name of Policy	Timetable for Review
Priority 3	
Alcohol and Drugs at Work	
Asbestos	
CDM	
COSHH (Latex)	
COSHH (Legionella)	
COSHH Policy	
Driving – Standards driving / use of pool vehicles	
Emergency – Bomb threats / evacuation guidance	
Smoking in the Workplace	
Waste management	

**HUMAN RESOURCES POLICIES AND PROCEDURES
PRIORITISATION FOR REVIEW**

Name of Policy	Timetable for Review
Priority 1	
Recruitment and Selection Policy	
Recruitment Starting Salaries	
Whistleblowing	

Name of Policy	Timetable for Review
Priority 2	
Additional Employment	
Adoption Leave and Pay	
Appraisal Policy	
Annual Leave	
Associate Specialists Discretionary Points	
Attendance Management	
Career Break	
Consultants Clinical Excellence Awards	
Disputes Procedure	
Disciplinary Policy and Procedure	
Employment of Bank and Agency Staff	
Escort Duties	
Extra Contractual Working Practices	
Flexible Working	
Flexi Time	
Gateway	
General Appeals Guidance	
Grievance Procedure	
Job Share	
Lease Car Arrangements	
Management of Change	

Name of Policy	Timetable for Review
Priority 2	
Managing Performance and Capability	
Maternity Leave and Pay	
Parental Leave	
Paternity Leave and Pay	
Pay Protection	
Retirement and Long Service Award	
Review Procedure	
Secondments	
Special Leave for Domestic and Family Reasons	
Staff Grade Optional Points	
Staff Involvement	
Study Leave	
Use of Personal Mobile phones at work	
Time off in Lieu	
Time off For Civic and Public Duties	
Time off for Medical and Dental Appointments	
Users, Carers Involvement in R&S	
Volunteers, Unpaid Workers Procedure / Guidelines	
Work Permits	

Name of Policy	Timetable for Review
Priority 3	
Clothing Allowance	
Home Working	
Management and Maintenance of Personal Files	
Managing Diversity	
Mileage	
Notice Periods	
On Call	
Pre and Post Employment Checks	
Recruitment and Retention Strategy	
Relocation Expenses	
Working Time Regulations	

ADMIN POLICIES - PRIORITISATION FOR REVIEW

Policy / Procedure	Objective in the Action Plan	Potential Impact	Date Agreed / Review Date	Priority Rating (1, 2, 3)
Complaints Policy & Procedure	Service delivery	Failure to appreciate cultural differences / inconsistent responses – potential for indirect discrimination	Recently approved?	1
Handling Habitual or vexatious complainants	Service delivery	Failure to appreciate cultural differences / inconsistent responses – potential for indirect discrimination	Recently approved?	1
Major clinical incident / adverse event immediate response	Service delivery	Failure to appreciate cultural differences / inconsistent responses – potential for indirect discrimination	Recently approved	1
Policy for managing personal injury, social care, human resources, property expenses and clinical negligence claims	Service Delivery Employment Resources	Risk of indirect discrimination	Unknown	1
Media relations policy	Communication	Risk that communications fail to reach diverse communities	Unknown	1
Fire policy	None	None – race neutral	Unknown	3