



**South West London**  
**Clinical Commissioning Group**

NHS South West London  
Clinical Commissioning Group  
120 The Broadway  
Wimbledon, SW19 1RH

26 October 2020

To: Elliott Colburn, Member of Parliament  
Sent by email: [tommy.gilchrist@parliament.uk](mailto:tommy.gilchrist@parliament.uk)

Dear Right Honourable Elliot Colburn MP

I am writing to you in my position as Accountable Officer of the NHS South West London Clinical Commissioning Group (CCG) in response to your letter of 17 September 2020. Please accept my sincere apologies for the delay in providing this to you.

Thank you for the interest shown in the work of the South West London CCG in relation to workplace diversity and inclusivity. This is an important area of work for both the South West London Clinical Commissioning Group and wider South West London Integrated Care System. You outlined a number of questions in your letter which I will answer in turn.

**Steps the Governing Body of the South West London CCG is taking to ensure diversity and inclusivity in its workforce.**

The Governing Body of the CCG recognises its responsibility under the Equality Act 2010 and particularly in relation to discrimination. In relation to our workforce, our stated equality and diversity aims are: ensuring that our workforce is representative of the communities we serve; that we eradicate behaviours that discriminate, harass or intimidate our people; and ensure compliance with the aims of the Public Sector Equality Duty of the Equality Act 2010.

The CCG has set up an Equality Diversity Inclusive programme to address equality, diversity and inclusion and is currently developing a plan to deliver the NHS Workforce Race Equality Standards (WRES). We are developing our plan in partnership with our staff and have recently concluded a 6 week programme of listening events between June – August 2020 where staff irrespective of race, gender, sexuality or disability were invited to share their experience of working in the CCG along with suggestions of improvement actions that would help make the CCG a great place to work.

In addition, we have reviewed the equalities data of the former 6 CCGs to identify areas that need to be addressed as part of our action plan and as a means of the Governing Body being able to establish a baseline for the new South West London CCG. We will track the impact of our actions (when agreed) against this data.

**What the CCG is doing to support and develop diversity of gender, sexual orientation, age, disability, religion and other such protected characteristics.**

Listening events have provided the CCG with the opportunity to have meaningful conversations with staff and work together to shape the culture of South West London CCG. Whilst this work was commenced through the Workforce Race Equality Standard we have engaged a wide range of staff and the improvements that we have identified will benefit all staff including those with protected characteristics irrespective of gender, sexual orientation, age, disability and religion.

To ensure this, the South West London CCG has developed a People and Organisational Development Strategy that sets out the culture we want to achieve. Our culture, values and behaviours aims are: to create a culture in which people from different backgrounds can feel valued, are treated fairly, are recognised for their unique contribution; and that we have a set of organisational values and behaviours which are known and lived by everyone in the CCG.

August 2020 saw the publication of the NHS People Plan which set out the priorities for workforce. The NHS People Plan has been built into the newly developed People and Organisational Development Strategy.

**Policies the CCG has in place to ensure that it actively promotes workplace diversity and inclusivity, including in its Governing Body; how this is measured and deemed effective; and how concerns can be raised where these expectations are not being met.**

In addition to the People and Organisational Development Strategy, we have a range of policies to promote workplace diversity and inclusivity including: Dignity at Work Policy; Grievance Policy; Disciplinary Policy; and Recruitment Policy (currently being redrafted).

We do not depend on policies alone in this regard and are working with staff to provide space and flexibility for the establishment of staff networks developed and designed by staff, facilitated by the Programme Director, Equality Diversity and Inclusion to help provide guidance as required. Whilst policies provide the framework for staff and the CCG to address issues in a structured way we also value the development of staff networks or other preferred for a to provide space for discussions aimed at improving equality diversity and inclusion.

The South West London CCG has a Speak Up Guardian who is an experienced Lay member of the Governing Body. Her contact details have been promoted to all staff through the daily South West London communication to staff and there is a plan for her to attend an all staff briefing event to ensure she is visible to all staff. In addition, our Programme Director for Equality Diversity and Inclusion has met with staff, in confidence, on a one to one basis, where this has been requested, and will continue to do so.

A new workforce report, showing data against key workforce metrics, is being developed and will be presented regularly to the Governing Body. In addition to this report there are a range of data streams that offer insight:

- Annual NHS staff survey
- WRES indicator findings
- Exit questionnaires

As we move forward, these data streams will be used to inform reporting to the Quality, Performance and Oversight Committee of the Governing Body enabling us to track progress on achieving our desired culture.

**Measures are in place to ensure service users are also treated equally and fairly, and the processes by which this is reviewed.**

Addressing inequalities in health is a key focus for the CCG, for example as a member of the Sutton Fairness Commission we have worked together to develop an inequalities workstream focusing on Hill House in Carlshalton, and includes clinical priorities impacting on inequalities including diabetes and hypertension alongside other factors such as obesity, smoking and alcohol.

At a local level, our CCG borough teams are working with partners to review local health and care plans to ensure we focus are efforts together locally on areas to improve health inequalities in our boroughs. Resident insights and experiences are reviewed in the development of these plans.

Our providers are held to account to deliver the duties as set out in the Equalities Act 2010 through compliance with the terms set out in the National Health Service Standard Contract. Delivery is reviewed through the mechanisms in place for monitoring and managing performance across all contracts. In addition, where any service change is proposed an

equality impact assessment is undertaken to ensure that the potential impact of the change is identified and mitigated where appropriate.

At South West London level, equality diversity and inclusion has been set as a joint partnership priority by the South West London Health and Care Partnership and a programme of work is being finalised. This commitment has become even more important as a consequence of the Covid-19 Pandemic and its impact on some people with protected characteristics and those within lower socio-economic groups.

I hope the information contained in this letter assures you that the CCG is focussing on equality, diversity and inclusion and is taking all necessary steps to ensure they are central in the work we do.

Yours sincerely



**Sarah Blow**  
**Accountable Officer**  
**NHS South West London Clinical Commissioning Group**