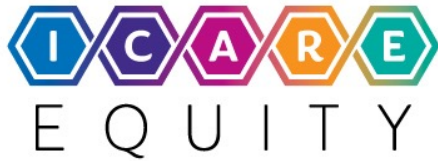


# Whittington Health Equality, Diversity and Inclusion Improvement Plan 2024-26

**Tina Jegede  
Swarnjit Singh**  
Associate Directors for Inclusion  
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**Whittington Health**  
NHS Trust

## Strategic context

Our People Strategy aligns with the NHS People Promise and the Long-term Workforce Plan. Improvements in the experience of the workforce translate into improved patient experience and health outcomes as shown by Michael West's research.

Feedback received during the strategy's development made clear the linkages between health inequalities and population health work for many of our staff who are also our patients. In line with the Trust Workforce Strategy, the use of pillars focus the Inclusion strategy into these four areas

**1] leadership and accountability 2] Culture & Communication 3] Recruitment, development and career progression 4] Health Inequalities.**

The four pillars align with the six high impact actions highlighted in the NHS equality, diversity and inclusion improvement plan to address the widely-known intersectional impacts of discrimination and bias.

We will have a real drive to move equality and inclusion forward through new ways of working, so we can plan more inclusively and deliver services that are accessible, effective and safe, to all the communities we serve. In line with the NHS plan, the Trust is also acknowledging the protected characteristics as outlined in the Equality Act 2010 and with tailored actions which extend beyond these to positively impact a wider range of groups and individuals. The actions therefore seeks to include the Trust's work as an Anchor institution and on health inequalities

Actions included are linked to those in our; Board Assurance Framework (BAF), National Staff Survey (NSS), Workforce Race Equality Standard (WRES), Workforce Disability Equality Standard (WDES), Ethnicity Pay Gap (EPG), Gender Pay Gap (GPG), Disability Pay Gap (DPG), Anti-Racism Strategy and actions





## Some of Our EDI Highlights

We have collaborated with staff networks and staff to produce a mission statement for our staff, which outlines the Trust's culture, values and ethics. It aims to inspire employees to participate and contribute towards achieving the vision of providing equal experiences and opportunities for all staff members across the organisation.

Workforce Race Equality Standard (WRES) - Improvements seen in most indicators, for example improvement and equity in WRES indicator 3 & 4, but disparities persist around access to training, progression, and experiences of bullying, harassment and discrimination for ethnically diverse colleagues. Next steps focus on becoming an anti-racist organisation through systems changes, accountability, and engagement.

Workforce Disability Equality Standard (WDES) - Mostly improvements, but issues remain around sharing of protected characteristics, bullying/harassment, feeling valued, and coming to work when feeling unwell. Next steps are increasing sharing of protected characteristics, addressing perception of managers pressuring disabled colleagues to work when unwell, and reducing harassment.

Ethnicity Pay Gap - Actions proposed involve inclusive recruitment, pay reviews, talent development, flexible working, and engagement. Recommend exploring intersectionality (how people's social identities overlap, i.e. gender, race, disability compounding experiences), and getting statistician input.

Gender Pay Gap - Inclusive recruitment, progression support, flexible working, engagement, data analysis. Highlight opportunities through apprenticeships, internal promotion, development of a women's network.

Disability Pay Gap - Actions include progression support, sharing of protected characteristics drive. Extra focus on maintaining status as a Disability Confident Leader and progressing our reasonable adjustments and neurodiversity work.

Anti-Racism Strategy – Action statement co-produced. Three priority areas identified around disparities in outcomes, access, experiences. Activities to be developed for each area through five separate Executive led workstreams. Emphasis on community engagement, co-production, accountability and evaluation.



## NHSE Six High Impact Actions -

The NHS Equality Diversity & Improvement Plan aims to enhance workforce diversity, foster inclusion, and reduce discrimination across the NHS workforce in England through six high-impact actions.

**Measurable objectives on EDI for Chairs Chief Executives and Board members.**

**Success metric**

1a. Annual Chair/CEO appraisals on EDI objectives via Board Assurance Framework (BAF).



**Overhaul recruitment processes and embed talent management processes.**

**Success metric**

- 2a. Relative likelihood of staff being appointed from shortlisting across all posts
- 2b. NSS Q on access to career progression and training and development opportunities
- 2c. Improvement in race and disability representation leading to parity
- 2d. Improvement in representation senior leadership (Band 8C upwards) leading to parity
- 2e. Diversity in shortlisted candidates
- 2f. NETS Combined Indicator Score metric on quality of training



**Eliminate total pay gaps with respect to race, disability and gender.**

**Success metric**

3a. Improvement in gender, race, and disability pay gap



**Address Health Inequalities within their workforce.**

**Success metric**

- 4a. NSS Q on organisation action on health and wellbeing concerns
- 4b. National Education & Training Survey (NETS) Combined Indicator Score metric on quality of training
- 4c. To be developed in Year 2



**Comprehensive Induction and onboarding programme for International recruited staff.**

**Success metric**

- 5a. NSS Q on belonging for IR staff
- 5b. NSS Q on bullying, harassment from team/line manager for IR staff
- 5c. NETS Combined Indicator Score metric on quality of training IR staff



**Eliminate conditions and environment in which bullying, harassment and physical harassment occurs.**

**Success metric**

- 6a. Improvement in staff survey results on bullying / harassment from line managers/teams (ALL Staff)
- 6b. Improvement in staff survey results on discrimination from line managers/teams (ALL Staff)
- 6c. NETS Bullying & Harassment score metric (NHS professional groups)





## High impact action 1 [ PILLAR: Leadership and Accountability ]

Chief executives, chairs and board members must have specific and measurable EDI objectives to which they will be individually and collectively accountable.

### NHS & ICB Actions: Success Metric

1a. Annual chair and chief executive appraisals on EDI objectives (Board Assurance Framework (BAF))

#### Actions:

- Every board and executive team member must have EDI objectives that are specific, measurable, achievable, relevant, and timebound (SMART) and be assessed against these as part of their annual appraisal process (by March 2024).
- Board members should demonstrate how organisational data and lived experience have been used to improve culture (by March 2025).
- NHS boards must review relevant data to establish

#### Current progress against success metric

- There is a Trust Board member's anti-racism action statement.
- Our board members have disclosed their protected characteristics to support greater transparency of our diverse leadership.
- Members of the board have undergone the WRES Expert/Kings Fund Allyship programme
- Executives are leading a workstream in response to the staff survey, using a 'You Say, We Did' approach
- Executive lead sponsors in place for each of our staff equality networks
- The Board reviews data identifying areas of concern, focusing on reducing inequalities and fostering diversity.
- Regular updates from committees on the progress of work around staff wellbeing.
- We have reviewed and updated our Board Assurance Framework.
- We have an 'equity' staff award category
- Review of outcomes of workforce policies which have high relevance to the Equality Act's general and specific duties

#### Actions towards success metric

- Ensure EDI is integrated into Board activities, such as strategy reviews.
- Board scrutiny on Equality Impact Assessments of Trust policy.
- Document event attendance and share it more widely with the Trust/community to support closing the feedback loop and maintain a visible commitment to celebrating EDI.
- Share and promote EDI messaging through communication channels and social media platforms.
- Annual reflection on EDI published to wider Trust/community.
- Support the anti-racist workstream.
- Use opportunities like staff awards to recognise EDI contributions.
- All Board papers to identify equality and diversity issues and impacts.
- Maintain the review of workforce policy outcomes highly relevant to the Equality Act's general and specific duties.



## High impact action 2 - [PILLAR: Recruitment, development and career progression]

Embed fair and inclusive recruitment processes and talent management strategies that target under-representation and lack of diversity.

### NHS & ICB Actions: Success Metric

- 2a. Relative likelihood of staff being appointed from shortlisting across all posts (WRES/WDES)
- 2b. Access to career progression, training and development opportunities. (NHS Staff Survey)
- 2c. Year-on-year improvement in race and disability representation leading to parity over the life of the plan. (WRES/WDES)
- 2d. Year-on-year improvement in representation of senior leadership (Band 8C and above) over the life of the plan. (WRES/WDES)
- 2e. Diversity in shortlisted candidates (to be developed year 2)
- 2f. Quality of training score (National Education and Training Survey (NETS))

NHS organisations and ICBs must complete the following actions:

#### Actions:

- Create and implement a talent management plan to improve the diversity of executive and senior leadership teams (by June 2024) and evidence progress of implementation (by June 2025)

### Current progress against success metric

- The probability of white staff being appointed over ethnically diverse colleagues has decreased from 2.18 in 2018 to 1.51 in 2022. Disabled staff's probability of appointment has been within the desired target range of 0.8 - 1.25, with figures of - 1.24 in 2019 and 1.18 in 2022. It's worth mentioning that disabled staff is more likely to be appointed than the average for England, which is 1.09.
- 2b – people's perception of fair progression/promotion opportunities increased from 41.2% to 46.3%.
- 2c – people saying they can access the right L&D opportunities increased from 55% to 59%
- For WRES indicator 4, the score is 0.98 for BME staff; the Trust has been within the target range since 2022 and is in line with London (0.97).
- We support reverse job fair annually jointly led by Ambitious About Autism and The Autism Project
- 2d – Disabled and ethnically diverse representation in Bands 8C and above has increased slightly.
- We have begun deep diving into our recruitment data and reviewed our recruitment training.
- We review talent pipelines and share job openings in our communities, while offering apprenticeships, functional skills, project search, and work experience to widen participation.
- We've evaluated career development for BME staff and introduced successful Band 2-7 and band 8a development programs. We've also published the Whittington Health People Strategy for 2023-2026.

### Actions towards success metric

- The use of apprenticeships to widen the pool of people coming into the Trust
- Evaluate the impact of the Trust's reverse mentoring programme
- Through the updated People Strategy, deliver recruitment and retentions strategies for our hard to recruit clinical workforce
- Provide comprehensive leadership development programmes and support
- We are expanding our talent management approach to include talent boards and competency based career progression paths for all levels, not just executives
- Review and amend approach for disabled candidates – work placement approach
- We will develop strategies in our WRES/WDES improvement plan to enhance representation, leading to parity in race and disability
- Implement 'The Expectations of Line Managers in Relation to People Management framework'
- We will be introducing the new NHSE New Line Manager Framework



## High impact action 3 [ **PILLAR: Leadership and Accountability** ]

develop and implement an improvement plan to eliminate pay gaps.

### NHS & ICB : Success Metric

3a. Year-on-year reductions in the gender, race and disability pay gaps (Pay gap reporting)

NHS organisations and ICBs must complete the following actions:

#### Actions:

- Implement the Mend the Gap review recommendations for medical staff and develop a plan to apply those recommendations to senior non-medical workforce. (By March 2024)
- Analyse data to understand pay gaps by protected characteristic and put in place an improvement plan. This will be tracked and monitored by NHS boards. Reflecting the maturity of current data sets, plans should be in place for sex and race by 2024, disability by 2025 and other protected characteristics. (By 2026).
- Implement an effective flexible working policy including advertising flexible working options on **organisations' recruitment campaigns. (By March 2024).**

#### Current progress against success metric

- 3a – We already undertake the Gender Pay Gap reporting; the gap has reduced from 2021/22 6.1 % to 2021/22 1.65% median rate and 2021/22 7.5% to 6.33%
- mean over the past year, in favour of males. Currently not capturing disability pay gap
- 3a – We introduced the ethnicity pay gap report this year. We have a median gap of 14.8% in favour of white colleagues.
- We offer flexible and remote working options as part of our policy and advertise them.
- Our pay gap reports are shared with staff through networks and accessible on our internet and intranet webpages
- The Workforce Assurance Committee addresses gender pay gap issues by analysing data, targeting actions, and benchmarking with other trusts

#### Actions towards success metric

- We will maintain EDI in board activities, such as strategy reviews and high standards of scrutiny on Equality Impact Assessments.
- We plan to introduce a template to capture the Disability Pay Gap report for next year.
- The Trust will ensure that gender equality remains integral to our Equality, Diversity and Inclusion Strategy.



## High impact action 4 [ PILLAR: Health Inequalities ]

Develop and implement an improvement plan to address health inequalities within the workforce.

### NHS & ICB Actions: Success Metric

- 4a. Organisation action on staff health and wellbeing. (NHS Staff Survey)
- 4b. Quality of training score (National Education and Training Survey (NETS))

NHS organisations and ICBs must

complete the following actions:

- Line managers and supervisors should have regular effective wellbeing conversations with their teams, using resources such as the national NHS health and wellbeing framework. (By Oct 2023).
- Work in partnership with community organisations, facilitated by ICBs working with NHS organisations and arm's length bodies, such as the NHS Race and Health Observatory. For example, local educational and voluntary sector partners can support social mobility and improve employment opportunities across healthcare. (By April 2025).

### Actions:

- Line managers and supervisors should have regular effective wellbeing conversations with their teams, using resources such as the national NHS health and wellbeing framework. (By Oct 2023).
- Work in partnership with community organisations, facilitated by ICBs working with NHS organisations and arm's length bodies, such as the NHS Race and Health Observatory. For example, local educational and voluntary sector partners can support social mobility and improve employment opportunities across healthcare. (By April 2025).

### Current progress against success metric

- We publish updated equality objectives in line with outcomes from the reports
- 4a In response to the staff survey report of 2023, where we scored below the national average for wellbeing, we have appointed a new Head of Wellbeing who began their role in October
- 4b All staff receive a wellbeing conversation, in line with with part of the NHS people plan strategy
- We have a well-established the Staff Inclusion Group which acts as the engine room for inclusion work at Whittington Health and feedback from staff equality networks
- A Reasonable Adjustment Policy is in place, and a centralised budget ensures equity of access.
- Firmed up the internal procurement system and review and update staff training.
- We have Mental Health First Aiders and other mindfulness, a Flexible Working Policy and an internal coaching service.
- We have a newly recruited Head of Wellbeing and Psychological Support. Counselling services such as the Employees Assistance Programme
- We have a robust & visible organisational development team.

### Actions towards success metric

- Disability hub on the intranet to enable ease of access to information. Cost of living advice is designed to help staff control their finances and reduce money worries.
- Issue religion and culture guide at the end of Q4
- The Staff Engagement Roadshow is part of the Trust Staff Engagement Strategy. It provides targeted programs, resources, and activities to support staff, foster a sense of community, belonging and offer professional development opportunities.
- As part of the People Promise, implement wellbeing conversations and wellbeing plans.
- Deliver equalities & inclusion programmes to tackle disparities in staff experience actively.
- Publish updated equality objectives based on PSED report outcomes. Advance equality and inclusion through innovative approaches for more inclusive and accessible services for all communities
- Engage with NHS England's 2024/25 work to establish a system to measure improvements in health inequalities among the workforce.
- We are due to undertake an organisational diagnostic aligned with the new NHS health and wellbeing framework.
- Continue to deliver outcomes against our neurodiversity and EDI strategy.





## High impact action 5 [ PILLAR: Recruitment, development and career progression ]

Implement a comprehensive induction, onboarding and development programme for internationally-recruited staff.

### NHS & ICB Success Metric

- 5a. Sense of belonging for internationally recruited staff. (NHS Staff Survey)
- 5b. Reduction in instances of bullying and harassment from team/line manager experienced by (internationally recruited staff). (NHS Staff Survey)

### Actions:

- Before they join, ensure international recruits receive clear communication, guidance and support around their conditions of employment; (By March 2024)
- Create comprehensive onboarding programmes for international recruits, drawing on best practice. The effectiveness of the welcome, pastoral support and induction can be measured from, for example, turnover, staff survey results and cohort feedback. (By March 2024)
- Line managers and teams who welcome international recruits must maintain their own cultural awareness to create inclusive team cultures that embed psychological safety. (By March 2024).
- Give international recruits access to the same development opportunities as the wider workforce. (By March 2024).

### Current progress against success metric

- We send assessment tools before arrival from the education lead, conduct comprehensive international recruit inductions and Welcome Meetings via Microsoft Teams. We have been awarded the NHS Pastoral Care Quality Award.
- We have a well established support for our international graduate nurses
- We have developed the International Medical Induction Booklet
- peer support and information to assist international recruits in settling in.
- There is Pastoral Support Lead and the Education Leads.
- We organise networking events to encourage connections among international recruits and keep them updated.
- We offer support to international recruits with NMC processes, signposting, and visa-related matters..

### Actions towards success metric

- International staff will be actively involved in developing robust talent pipelines, promoting diversity and inclusion.
- We are increasing the frequency of events and programs to ease the cultural transition of internationally trained graduates.
- Produce cultural training and a manager's guide for international recruitment to support both sides of the transition.
- Continuing to guide international recruits by actively signposting them to external groups and resources to facilitate their integration into our local community and our organisation
- Our inclusion training program includes sessions on cultural competence and inclusion to help foster an inclusive workplace culture.
- Agree on a process to track the experiences and effectiveness of our international recruits.



## High impact action 6 [ PILLAR: Recruitment, development and career progression ]

Create an environment that eliminates the conditions in which bullying, discrimination, harassment and physical violence at work occur.

### NHS & ICB Success Metric

- 6a. Improvement in staff survey results on bullying / harassment from line managers/teams (NHS Staff Survey).
- 6b. Improvement in staff survey results on discrimination from line managers or teams (NHS Staff Survey)
- 6c. NETS bullying and harassment score metric (NHS professional groups).

#### Actions:

Review data by protected characteristic on bullying, harassment, discrimination and violence. (By March 2024).

- Review disciplinary and employee relations processes. Where the data shows inconsistency in approach, immediate steps must be taken to improve this. (By March 2024)
- Ensure safe and effective policies and processes are in place to support staff affected by domestic abuse and sexual violence (DASV). (By June 2024).
- Create an environment where staff feel able to speak up and raise concerns, with steady year-on-year improvements. (By March 2024).
- Provide comprehensive psychological support for all individuals who report that they have been a victim of bullying, harassment, discrimination or violence. (By March 2024).
- Have mechanisms to ensure staff who raise concerns are protected by their organisation.

#### Current progress against success metric

- 6a. Since 2021, the rate of staff experiencing harassment, bullying or abuse from patients or service users has declined. In 2022/23, ethnically diverse staff experience such incidents at a rate of 29.3%, while white staff experience them at 30.4%. Disabled staff are 9.8% more likely to experience harassment, bullying or abuse from managers than non-disabled colleagues.
- 6b – The percentage of staff experiencing discrimination from managers or colleagues is showing steady improvement, 15% in 2021 and 12% in 2023.
- 6c – The NETS score for never experiencing bullying and harassment has improved from 79% in 2021 to 82% in 2023.
- We have the Challenging and Aggression Behaviour Policy in place and the zero tolerance for discrimination poster on display A& E, OPA & community centres
- In line with the Trust's commitment to a culture of openness, learning and restorative practice, the Just Culture programme has been implemented.
- We have strengthened the informal part of disciplinary processes and have reviewed the governance and touch in points of the disciplinary process.
- We have a well-established Freedom to Speak Up (FTSU) and a diverse group of FTSU advocates
- We have developed an individual & organisational allyship checklist
- The Head of Wellbeing provides post-incident psychological support to staff/victims of abuse.

#### Actions towards success metric

- We're committed to becoming anti-racist, promoting equal opportunities in our policies and practices via our Integrated Care Service Units
- We will promote training attendance and initiatives, including the NHSE Core Management Inclusion Programme. Our leadership development program to cover cultural intelligence, conscious inclusion.
- We're developing a team framework and conflict pathway to manage workplace conflicts.
- Our staff survey scores for 'raising concerns' are below the national average. We have updated our Freedom to Speak Up policy and established a strong FTSU champion network.
- We need to focus on tackling bullying and harassment in the workplace and establish policies that promote sexual safety in the workforce.
- Embed the nursing and midwifery anti-racism frameworks, including the Capital Midwife anti-racism framework.
- As part of our People Promise, we need to implement Wellbeing Guardians/Champions, First Aid Champions, and Critical Incident Practitioners.
- Introduce and implement a framework for conducting conversations that promote wellbeing.



**Whittington Health**  
NHS Trust

## **Related Documents & Reports**

Appraisal Guidelines

NHS Staff Survey results

Whittington Health WDES Report 2023

Whittington Health WRES Report 2023

Gender Pay Gap report 2022 – 23

Disability Pay Gap report 2022 – 23

Ethnicity Pay Gap Report 2022 – 23

NHS EDI Improvement Plan | Accessible version NHS Constitution

NHS People Plan 2023

Equality Act 2010

Reasonable Adjustment Policy

Challenging Behaviour & Aggression Policy

Mend the gap (2020)

National NHS health and wellbeing framework

The National Education and Training Survey (NETS) NETS 2022 National Key Findings Report.