

Equality Implementation Plan 2015-2020: CFO & Contracted Prime Providers

Area of Equality Commitment	Question	CFO Staff- Response & Responsibility	Prime Provider	Date to be achieved
Staff	How will staff be trained in equality & diversity/ how will training be reviewed?	<p>→ E&D information is featured within the CFO Induction Pack and the Staff Handbook. The importance of the policy is discussed with the employee on their first day of employment via the office manager.</p> <p>→ Mandatory 'E&D essentials' training is available on CSL portal for all staff, regardless of grade. Completion rates are monitored by line managers to ensure compliance.</p> <p>→ Additional courses are available on CSL which feature elements of E&D, including; Racial awareness & Unconscious bias. Staff are encouraged to complete by line managers.</p> <p>→ Upon completion of CSL training courses, staff complete an evaluation form to detail how training could be improved. Details are sent to ERDG (Equalities Rights and</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • Staff will receive E&D training during induction phase and continue to receive regular updates and complete annual refresh training during employment • Management to make staff available for E&D training • Equality & Diversity training to be reviewed annually during policy review • Ensure that cross cutting themes are discussed at each monthly staff meetings as a standard agenda item • One organisational policy to be covered at each team meeting – to be included within meeting minutes for the purpose of audit • All CFO3 delivery guidance and documentation is held on the Shaw Trust Extranet <p>APM:</p> <ul style="list-style-type: none"> • E-learning E&D awareness training is provided for all new staff to form part of the induction process. This training has tested learning outcomes to measure learner understanding. • Annual Refresher E-learning E&D awareness training is provided to all employees to ensure the most up to date information is cascaded and applied. • Equality and diversity objectives are an integral part of the Mutual Development Review (MDR) process and will be regularly reviewed by line managers in conjunction with staff members • Scheduled observations take place with delivery teams to ensure compliance in this area. • Managers have attended an E&D workshop in June 2018, which focusses on how to embed key E&D working practices within their teams. <p>Ixion:</p> <ul style="list-style-type: none"> • E&D featured in staff induction process and mandatory E&D training for all staff • Ixion Head HR & Head of Group will review the policy annually in terms of training effectiveness 	<p>CFO Staff: Continue training throughout life of project, reviews are monitored by ERDG.</p> <p>Prime Providers: Training will be ongoing throughout the project and training reviewed annually during policy update</p>



		Decency Group) for review and necessary improvements.	<p>Career Connect:</p> <ul style="list-style-type: none"> • Training shall be reviewed through an ongoing staff development equality programme, which reaches beyond induction. We will ensure that all our employees are equipped to tackle all forms of discrimination and to promote equality and diversity in all aspects of their work, both internally and across the partnership. • Refresher training delivered every two years via e-learning module • Learner feedback captured after each workshop and the programme updated in view of evaluation • Training reviewed against emerging changes in E&D legislation 	
Staff	How will the organisation evidence commitment to supporting an anti-bullying/anti-harassment policy?	<p>CFO staff will be informed of the anti-bullying/anti-harassment policy within the initial CFO induction. This will also be reiterated in the CFO staff handbook which is released annually.</p> <p>Staff will be encouraged to familiarise themselves with the policy and understand how to report cases of bullying/harassment.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • To ensure that staff are aware of the Shaw Trust Code of Conduct (anti-bullying/anti-harassment policy) and the organisations commitment to safeguarding staff. Staff will be encouraged to familiarise themselves with the Shaw Trust code of conduct policy and understand how to report cases of bullying/harassment. • All policies to be available to staff via the Shaw Trust Intranet. <p>APM:</p> <ul style="list-style-type: none"> • APM ensure all employees read and sign a copy of the APM Code of Conduct prior to commencing employment. All HR policies including the Bullying and Harassment policy on the quality management system. • APM values, Code of conduct and Bullying and Harassment policy are discussed at induction and referred to through all training interventions and touch points to reinforce expectations that all employees act with dignity and respect. APM commit to providing a working environment free from bullying or harassment on any grounds. APM will not tolerate acts that breach this policy and all instances of such behaviour, or alleged behaviour, will be taken seriously, be fully investigated and may be subject to Company disciplinary procedures. Additionally, any person found to be inciting, encouraging or condoning such behaviour will be subject to disciplinary action. • APM provide an employee assistance programme that employees can utilise to discuss any cases of historical bullying they have experienced in their past which may have impacted on them. • APM share good news of participants who may have overcome this and who act as Mentors to other participants 	<p>CFO Staff: The staff induction pack will include information regarding the grievance procedure and will be updated annually for new staff and the staff handbook will also be updated annually and released to new staff.</p>



			<p>Ixion: Anti bullying and anti-harassment policy in place and staff made aware on induction. Policy makes expectation and reporting routes clear, reinforcing our zero tolerance on this.</p> <p>Career Connect: Career Connect have a code of conduct document which is made available to all staff. Bullying and harassment is discussed at induction and staff are made aware of all policies relating to this topic. An employee assistance programme is available to those who believe they may need support in dealing with harassment or bullying.</p>	
Staff	Annual monitoring of staff by characteristics (with a view to identifying any significant under-representation)	<p><i>Characteristics for CFO are monitored centrally by , details below;</i></p> <p>→ As part of the vetting process (security checks) candidates complete a questionnaire to detail their protected characteristics details (gender, orientation, age etc.) and records are sent to PAG (analytical agency of HMPPS). PAG collate & analyse the statistics and once verified forward to HR to keep records.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> Annual monitoring of characteristics will be achieved through the monitoring of employee data, from recruitment through to employment and people leaving. We will measure our workforce statistics, finding potential under-representation and addressing any concerns these statistics may raise. They will be shared with management to ensure appropriate steps can be taken. <p>APM:</p> <ul style="list-style-type: none"> The HR department will monitor and annually review the composition of the workforce and of applicants for jobs in relation to; Ethnic origin Employees with a disability Adjustments and support provided Gender ratio of management team Gender ratio of workforce Proportion of flexible working granted Proportion of staff returning to work following a period of maternity leave Average length of service, ethnic composition of disciplinary and grievances. These metrics will be captured annually in order to benchmark against other organisation, best practice, demographics and national statistics The HR department will monitor recruitment and selection practices through the collection of equal opportunities monitoring data, which will be reviewed and used to inform improvements and changes in processes where required. We will work to ensure that demographic groups are represented as a collective within our staff APM have achieved Disability Confident Employer Leader status which also includes demonstrating that positive action is undertaken to attract, recruit and retain disabled people. APM have committed to the Mindful Employee Charter which advocates the support of employees with Mental Health conditions 	<p>CFO Staff: Ongoing through the project, Staff Equality policy shall feature within the annual update.</p> <p>Prime: All prime Providers have processes in place to address under-representation & reviews of statistics take place on an annual basis.</p>



			<ul style="list-style-type: none"> • APM have published their Gender Pay Report and associated commitments to reducing this gap on the APM website <p>Ixion:</p> <ul style="list-style-type: none"> • Ixion routinely collects and analyses information on employees and customers by gender, marital status, ethnic origin, sexual orientation, religion/beliefs, grade and length of service in current grade. • Information regarding the number of staff and customers who declare themselves as disabled is also maintained. • We monitor all new employees E & D data – through a questionnaire sent with our offer pace, and we record this on our HR Software. • We monitor E & D data for all applicants, for new roles within the Group. This is kept confidential within HR and not provided as part of any selection process. • We take positive action to encourage participation of underrepresented groups in our workplace and our programmes, and take positive action to ensure the demographic of our workforces reflects the diversity of the community in which they work. • We will take positive action to attract underrepresented groups through targeted marketing activity. • We will interview all disabled applicants that meet the minimum criteria for any vacancies, and they will be considered on their abilities. • We also make every effort when employees become disabled to make sure they stay in employment and make reasonable adjustments where possible. <p>Career Connect:</p> <ul style="list-style-type: none"> • Monitoring is an essential aspect of the development of equality and diversity at Career Connect. Monitoring arrangements are in place for applications to jobs, promotion, training and development, grievances, disciplinary actions, performance appraisal, dismissals and other reasons for leaving. We also apply these principles equally in a TUPE situation. • Career Connect have a positive approach to recruitment which includes distribution of job vacancies through direct mailshot to community groups working with minority groups and Disability Confident standard on job adverts to encourage disabled applicants. • New gender pay gap reporting arrangements in place 	
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<p>Staff</p>	<p>Equality objectives in personal development/ appraisals</p>	<p>→All SPDR's are grade specific and written by the Senior Management team to ensure fairness & consistency.</p> <p>→The results and markings of SPDR's for all individuals are discussed by SMT to ensure fairness, remove any discrimination/bias and ensure all line managers complete in a consistent manner.</p> <p>→SPDR's allow employees to discuss career progression and line manager's encourage employees to want to progress and work with them to address career progression</p> <p>→ Courses are available on CSL which address personal development, including; Assertiveness (behaving confidently) & Well-being (resilience & stress). The majority of courses on CSL are free and accessible to all staff members and grade specific.</p> <p>→The Annual Civil Service Survey includes questions with an E&D theme. Results are collated & low scores are discussed by SMT to enable an action plan to be created to address problematic areas.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • Staff development and career progression will be based on merit and will be offered to all staff regardless of background or personal circumstance. • Shaw Trust will ensure equality objectives are included within Shaw Trust CFO3 delivery staff developmental plans and staff will engage in regular supervision and appraisals. • Ensure that Shaw Trust CFO3 delivery staff have access to policies, organisational news and updates • Shaw Trust CFO3 delivery team will provide weekly feedback to Operations Manager/Team Leader by means of weekly performance call • Shaw Trust CFO3 delivery team to be provided with laptops so they can access policies, organisational news and updates, and contact staff from the organisation to assist if have concerns or queries • Shaw Trust CFO3 delivery team to be provided with Intranet and Extranet access <p>APM:</p> <ul style="list-style-type: none"> • From August 2018, APM employees will undertake a monthly 'check-in' performance and development review to discuss monthly performance expectations, quality measures, wellbeing and safeguarding including any further support and development required for themselves or participants. • APM are developing a new annual talent review to explore an employee's current performance, additional responsibilities, create a talent action plan for the year ahead, capture all training & development requirements, career aspirations & areas of interest sections. • The new process will allow employees to reflect on their own performance and suggest areas and ideas for improvement. • The requirement for training courses for employees are assessed in conjunction with operational requirements, best practice and employee development. <p>Ixion:</p> <ul style="list-style-type: none"> • Facilitate special training or support to enable employees to progress within the Company. • Monitor provision of training and development opportunities for staff to ensure equal access. <p>Career Connect:</p> <ul style="list-style-type: none"> • Managers are responsible for ensuring that staff implement relevant quality procedures/ work instructions and have access to appropriate learning opportunities which meet their personal development needs 	<p>CFO Staff: SPDR's take place annually with a 6 month interim, CSL courses available anytime to staff & civil service survey is annual.</p> <p>Prime: Personal development is available throughout the project for staff members & appraisals take place annually.</p>
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<p>Staff & Participants</p>	<p>How will accessibility for people with disabilities be taken into account in the project?</p>	<p>→ Equality for disabled participants is promoted throughout the project by ensuring all activities and opportunities are open to all participants, making any necessary changes to cater for disability. This includes requiring contractors to ensure that all offices and buildings can be accessed by clients and providing material in a variety of formats. This process occurred during due diligence and is continually monitored by the OPM's.</p> <p>Clients with learning difficulties such as dyslexia are supported on a 1-2-1 basis by case managers and signing services are made available for clients with hearing difficulties. This is reviewed by OPM's as and when appropriate.</p> <p>→ The existing HMPPS policy relates to CFO staff. The policy details the guaranteed interview scheme for disabled applicants and suitable adjustment for disabled people as and when necessary.</p> <p>→ CFO applies due diligence when selecting prime Providers to ensure that they are committed to and are able to fulfil their contractual</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • Shaw Trust has over 30 years of experience in supporting disabled and disadvantaged individuals in overcoming barriers and promoting independence. We will use this knowledge and experience to support disabled participants and encourage participation in the programme. • The Shaw Trust employs a Specialist Disability Coordinator and have created a bespoke in house disability equality course to ensure staff are able to implement and develop good working practices. • A Specialist Disability Coordinator will support our accessibility and E&D practices and will be invited to team meetings. <p>APM:</p> <ul style="list-style-type: none"> • Disability is a hard-to-help group and performance is monitored to ensure Providers work with disabled participants and provision is effective. Statistics are reviewed on a monthly basis by CFO& APM. • All APM community sites are DDA compliant which ensures disabled participants can access facilities. • Bespoke training is available to provide employees with the necessary skills and knowledge in this area in order they can provide the most effective support to their participants • APM has commenced a programme to introduce Accredited Mental Health First Aiders with further specialised mental health and disability training planned for 2018 <p>Ixion:</p> <ul style="list-style-type: none"> • All delivery sites have disabled access or rooms suitable for those with mobility issues to access. • For sight or hearing impairment issues, we would work alongside the CRC's to utilise the processes they have in place to manage the people in question. If the CRC's/NPS are not able to address the issues we would actively work with local support agencies to ensure that we can maintain the Participant's ability to stay on or participate in the project. Events include pre event identification of issues and are addressed to ensure inclusivity such as hearing loops being made available where needed. <p>Career Connect: All delivery locations used by the project are DDA (Equality Act) Compliant. Where additional need is identified other more suitable locations will be identified and if necessary hired.</p>	<p>CFO Staff: Review Provider statistics on a monthly basis to ensure targets for disabled participants are achieved.</p> <p>Primes: Ongoing throughout the project</p>
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		<p>requirements with regards to clients with disabilities.</p> <p>→ People with disabilities are named as a 'Hard-to-Help' group & Providers are required to deliver services suitable for those with disabilities. This will be identified in the contract bids, final ITT & through OPM monitoring.</p> <p>→ OPM's will monitor statistics to ensure Providers meet set targets for disabled people.</p>		
Sub-Contractors	How will the Prime Provider ensure sub-contractors have an Equality policy before awarding a contract? How will Provider's monitor and evidence Sub-Contractor's commitment to Equality and Diversity?	The CFO Engagement Manager will ensure all Prime Providers keep central copies of their sub-contractors Equality & Diversity policies and ensure they are updated annually.	<p>Shaw Trust:</p> <ul style="list-style-type: none"> Shaw Trust will discuss equality and diversity at contract review meetings on a monthly basis and ensure Equality and Diversity policies are updated on an annual basis. Shaw Trust will ensure all delivery guidance and documentation is held on the Shaw Trust Extranet Subcontractors will be audited to provide assurance of their commitment to crosscutting themes. All Subcontractor E&D policies and implementation plans will be collated and updated annually. Regional supply chain manager to ensure that subcontractor CFO3 delivery teams are provided with laptops so they can access policies, organisational news and updates, and contact staff from the organisation to assist if have any concerns or queries. All subcontractor delivery teams will complete E&D training E-learning at induction and will receive regular updates and an annual refresh. Subcontractors will be require to evidence an anti-bullying/anti-harassment policy within their E& D policy. <p>APM:</p> <ul style="list-style-type: none"> APM will ensure copies of partner E&D policies are obtained at Due Diligence stage and renewed/updated annually. E&D is discussed a monthly and quarterly performance reviews and any issues are addressed immediately and recorded. 	CFO Engagement Manager: EM will monitor on an annual basis to ensure Providers have copies of Sub-Contractors Equality Policies.



			<ul style="list-style-type: none"> • APM share all internal E&D training opportunities with their supply chain to attend. This includes group based and system-based training such as Equality & Diversity, Safeguarding and Prevent. <p>Ixion: Sub contractors are required to provide current, adequate, Equality and Diversity policies at contract commencement and update them on an annual basis as monitored on our Intend system.</p> <p>Career Connect: E&D are a standing item on subcontractor review agendas. They are required to hold up to date, legally compliant policies that are reviewed annually. Copies of policies and reviews are provided to ANWC by each supplier.</p>	
<p>Participants</p>	<p>How will they be informed of the policy</p>	<p>→ CFO policy is featured on the CFO3 website which is accessible for all, policy not specifically relevant to participants however can be informed if necessary.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • Participants will be informed of our commitment to equality and diversity during the enrolment stage. A Welcome Pack will be developed which will inform participants of our commitment to equality and diversity and will reference our equality policy. • The Shaw Trust, Equality and Diversity Policy is held on the Shaw Trust Intranet and Extranet <p>APM:</p> <ul style="list-style-type: none"> • Customers will be advised about this policy as part of their induction to the service they receive from Ixion. The policy will also be available on our website. <p>Ixion:</p> <ul style="list-style-type: none"> • Customers will be advised about this policy as part of their induction to the service they receive from Ixion. The policy will also be available on our website. <p>Career Connect:</p> <ul style="list-style-type: none"> • Participants are informed at induction. Referring organisations are informed of policy at team meetings and directly through offender managers to enable them to discuss with Participants prior to referral 	<p>CFO Staff: Policy uploaded to the website and updated annually to reflect changes.</p> <p>Prime: Participants are informed during Induction phase</p>



<p>Participants</p>	<p>How will they learn about good relations (promoting understanding between people from different groups)</p>	<p>→ Not applicable to CFO as staff do not directly work with participants.</p> <p>→ This notion will be supported by enquiring and ensuring Prime Providers promote Equality ideals to staff & participants, which will be identified within Providers Equality Policies and Providers will be questioned by the OPM's to ensure this is occurring.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • Although not the main audience for this policy, we expect clients to show basic E&D behaviours, such as not discriminating and not bullying. Participants will be informed of the Shaw Trust/Sub-Contractor anti-bullying policy/anti-harassment policy. • Shaw Trust will work with participants to complete a one page profile, which will support participants to build better relationships by truly understanding what really matters to the participant in their life and the way they are supported to live it. The profile will provide a record that can move with the participant as they transition from service to service or use multiple services. The profile will be regularly updated to reflect the participant's changing circumstances and aspirations. Staff will also have one page profiles, which will help participants feel like they get to know the person, rather than just the job title. <p>APM:</p> <ul style="list-style-type: none"> • APM will monitor and evaluate the effectiveness of the Equality and Diversity policy with its employees, customers and associated partners. • APM will challenge participants who display any negative behaviours and educate and promote equality and diversity ideals throughout service delivery. • APM will monitor and evaluate the effectiveness of the Equality and Diversity policy with its employees, customers and associated partners. • APM will challenge participants who display any negative behaviours and educate and promote equality and diversity ideals throughout service delivery. <p>ixion:</p> <ul style="list-style-type: none"> • Embed equality and diversity issues into service delivery to raise customer awareness and promote good citizenship and British Values. • Challenge discrimination and negative behaviour and empower customers to do so. • Consult customers regularly about equality and diversity to inform continuous improvement. • Provide appropriate channels for customers to raise and complaints or grievances. <p>Career Connect:</p> <ul style="list-style-type: none"> • Participants shall be informed through Induction, information published on the intranet and a bi-annual programme of refresher training 	<p>CFO Staff: N/A</p> <p>Prime: Educate participants during induction and continue into delivery. Ongoing throughout the project</p>
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<p>Women</p>	<p>How will you encourage women to take part in the programme and delivery is gender specific?</p>	<p>→ CFO has extended its target cohort for women to include those on remand, which allows a greater number of female offenders to access the programme.</p> <p>→ Women are an ESF priority & named as a 'Hard-to-Help' group. Providers are required to deliver specific gender related provision to this group. During bid & implementation stages, Providers will be required to evidence ways in which they will provide specialist provision to females and sustain involvement.</p> <p>→ All prime Providers will be required to work with female offenders in specific programmes limited to this cohort such as women involved in the sex industry and women with low level mental health needs. The level of provision will be monitored via the quarterly 'Hard-to-Help' reports. The reports are monitored by the CFO Engagement Manager and concerns raised via the OPM's.</p> <p>→ The CFO monitor the performance statistics monthly to ensure targets for this group are achieved by prime Providers. Are under</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> To encourage female participation, the Shaw Trust Studio team have produced gender specific marketing material for our CFO3 delivery to target a female audience. Shaw Trust have sourced specialist supply chain provision such as Women In Prison, who deliver end to end provision and strengthen our service offer to potential and existing female participants. Through developing and working with our supply chain partners and sharing best practice, we seek to continually improve our service offer and provide equal access to the appropriate support for both male and female participants. The Shaw Trust will review delivery to our target groups on a regular basis and ensure where appropriate, we develop specialist support, such as Tier 3 spot purchasing to strengthen our offer. <p>APM:</p> <ul style="list-style-type: none"> APM sub-contractor 'Changing Lives' are a specialist organisation who engage vulnerable women and support desistance. This is achieved by valuing people for who they are and not making any pre informed judgements about the women they work with. Changing Lives work with women to negotiate and develop a person-centred package of support that is SMART and gives account to the individuals' strengths and abilities. Changing Lives experience is that women often face life circumstances that are specific to gender, such as domestic abuse, childhood sexual abuse, sexual assault, and being the primary caretaker for children which can result in multiple and complex needs. It is for this reason that we have developed a specific approach to work with women, understanding the realities of their lives, through an evidence-based range of interventions with Women Offenders. Examples of provision include; Specialist support for women involved in survival sex work, those who have been sexually exploited, involved in Escort Industry or victims of trafficking. Women are offered 1:1 mentoring support, support with housing application forms, regular contact via telephone calls & text messages, food parcels, support with childcare, shower & laundry facilities, clothing, Debt & Benefit Advice and Mental Health Support. Changing Lives arrange for MARAC referrals for women identified as being at high risk or harm or homicide from domestic abuse. Services are available within both custody & community. 	<p>CFO Staff: Provider statistics reviewed on a monthly basis to ensure Provider comply.</p> <p>Primes: Review monthly statistics and increase delivery to females as and when necessary</p>
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		<p>performance is addressed via the OPMs.</p> <p>→Encourage Providers to use a flexible approach to female rehabilitation in terms of delivery locations. Providers are encouraged to deliver provision in women’s centres and women only hubs, as detailed within the original bid submissions.</p>	<p>Ixion:</p> <ul style="list-style-type: none"> • We have sourced specialist female Providers in our South East contract and actively deliver in female establishments. In addition, we are in the process of commissioning a specialist female support programme for women in HMP Bronzefield for those with specific needs and a background of sex working. • More generally, our Regional Development Manager (one in each region) will be actively liaising with women’s centres and women’s support agencies to ensure that we can offer gender specific support to females in the region and actively work to include them in delivery plans. Case Managers in each area also link up with the centres and agencies to offer support and we are responsive to the needs of the agencies such as providing female case workers to deliver on their premises or in suitable pre agreed locations. • The development fund would act as a potential source of money to develop bespoke responsive programmes for those with gender specific needs as well as DAF funds being utilised on an ad hoc basis where required. <p>Career Connect:</p> <ul style="list-style-type: none"> • ANWC offer female Case Managers who are dedicated to working with female participants. They are based at ‘Women Only Centres’/’Women’s supervision Centres’ and Female Specific Approved Premises, where they are co-located with a range of women’s specific support services and Offender Managers. This enables women to access our support, alongside specialist provision for relevant issues such as Domestic Violence, Women’s Health, pregnancy, Parenting, debt/finance services. The dedicated Case Manager also delivers the Gaining Opportunities and Living Skills (GOALS) programme to women only groups. This enables them to speak openly in a safe environment about their barriers and personal circumstances. • We offer our services to women within HMP Styal. This includes a specialist mentoring provision delivered by an ANWC sub-contractor Salford Foundation • We also have a Sub-Contract with Adelaide House Approved Premise. A female Case Manager adopts a holistic approach to identify and address specific needs. This requires specific knowledge regarding women’s specific issues such as street work, domestic violence, abuse, children taken into care etc. • A further specialist contract ANWC has to support women participants is delivered through Lancashire Women’s Centre. This involves delivery of a Personal Social Development Award which is aimed at tackling barriers such as low self-esteem and confidence and developing personal skills. 	
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<p>Older Offenders (50+)</p>	<p>How will you encourage older offenders (50+) to engage with the programme?</p>	<p>→ Resettlement for older offenders are demonstrated to be different from the rest of the prison population & CFO is committed to working with partners in health and local government to address any urgent needs. This is the responsibility of the CFO Policy Lead.</p> <p>→ Prime Providers are required to evidence their commitment to engaging older offenders as part of due diligence processes.</p> <p>→ Operational Performance Managers will monitor the targets for older offenders on a monthly basis to ensure older offenders are accessing provision and engaging.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • Many older offenders will not have even started to contemplate living in the community or filling their time constructively on release whilst still being in denial through fear and anxiety. Some have not been successful in getting parole on a number of previous occasions. Restrictions in education and prison workshop opportunities due to physical demand, mobility issues or access restrictions mean that more of this population (including longer sentenced prisoners) have had little meaningful or purposeful activity during their sentence. As a result the approach in supporting this population tends to differ to meet their specific needs. • The support resources of our specialist supply chain partners have been developed with service user consultation and input. Our approach reflects what our older population have asked for. The pace and delivery of interventions and sessions match the cognitive ability of the older participant as this can slow with age. We're prepared to repeat elements and provide notes or summary documents for later reflection. Good practice font size for all our resources is 14+. • It is important to carefully manage their expectations and the reality of the difficulties they will face living in the community. They will be at a far greater risk of being socially excluded as they suffer from the restrictions, stigmas and aggravating factors of being offenders. Specific age related support for older offenders is hard to find but important as their needs are different. We try to signpost to organisations that understand the challenges faced by the older population. • An example of a specific intervention that we tend to need to invest more time on is disclosure. A number of our participants have serious index offences (offences against the person) and need support about how they disclose their time in prison and offences during normal everyday interactions in addition to workplace interviews. Many underestimate the weight of public feeling and put themselves at risk through their disclosures in community settings. <p>APM: Older offenders will be supported via;</p> <ul style="list-style-type: none"> • Stakeholder engagement as APM will ensure that CRC's/NPS/HMPS teams are aware of the support APM can provide under the CFO3 contracts. APM will strive to share good news stories of 50+ group and their successes to reinforce 	<p>CFO Staff: Provider statistics reviewed on a monthly basis to ensure Provider comply.</p>
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			<p>that they are a group that require specialist provision and support in order to effectively rehabilitate.</p> <ul style="list-style-type: none"> • Effective participant engagement- Participants will receive tailored short courses and vocational and education training support to suit the 50+ age group (for example IT skills). APM will strive to promote good news stories relevant to the 50+ group to encourage participation. <p>ixion: Older offenders will be encouraged to engage with the CFO3 programme through the provision of support that addresses common barriers that could be faced by participants over 50. This support could be in offered in a variety of forms such as (but not limited to):</p> <ul style="list-style-type: none"> • 1:1's to address specifically highlighted issues • Through DAA's developed around typical support needs of this age group e.g.: using IT and social media as a tool to facilitate reintegration back into society. • Through Specialist Support Referrals to relevant agencies such as Age Concern <p>In custody and community locations, Case Managers will liaise with managing agencies to target this group (through NOMIS and DELIUS etc.) and promote the opportunities available for participants aged 50+ and ensure flexibility is offered in terms of accessible locations. Links with appropriate supporting agencies will be made to support with addressing any age specific barriers that the Case Manager is not able to address, and to ensure that a comprehensive understanding of such issues is maintained throughout the life of the programme.</p> <p>Career Connect:</p> <ul style="list-style-type: none"> • All ANWC case managers work closely with offender managers and prison staff to promote referral to our programme. We explain our offer to those 50+ including one to one engagement, mentoring and access to our range of suppliers. • We support the needs of this age category, encouraging them to access services, health care, community links, job opportunities and realising the potential of new technology. • Case managers operate points of contact within community offender management locations and are therefore accessible on demand. • We also operate within the prison estate where we ensure needs post release will be met by our team or appropriate other agencies. • At HMP Wymott we offer the achieve more course specifically targeted at this age group 	
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<p>Performance</p>	<p>How the projects will monitor its performance in terms of representation effectiveness of different groups</p>	<p>→ CFO Research Statistician produces monthly reports from CATS (reporting mechanism Providers use to evidence provision) to detail how many participants each Provider has worked with. The reports details protected characteristics (age, gender etc.) The reports will show the representation for each group, including any under representation.</p> <p>→ Prime Providers have targets to achieve each month and performance is analysed by Operational Performance Managers. The targets include hard-to-help groups (females, disabled etc.) and ensure delivery is wide spread and effective.</p> <p>→ CFO Engagement manager collects information from Providers & produces bi-monthly reports to detail the provision primes deliver for hard to help categories. This will contribute to monitoring performance for different groups and the quality of delivery.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • This is monitored through reports generated by our Operations Managers who are responsible for the ECA targets and this is reported monthly as part of Contract Management. • Each ECA has produced an equality and diversity plan to ensure delivery is aligned to both our central policy and local requirements. This plan will be reviewed on an annual basis to reflect on achievement to date and to benchmark future progress. • Shaw Trust performance will be scrutinised and include achievements in relation to ESF requirements, and also against profiled cohorts, at staff 1-1 and appraisal. <p>APM:</p> <ul style="list-style-type: none"> • APM are contractually bound to achieve monthly CFO targets for each 'Hard-to-Help' group and this is measured and monitored by CFO monthly statistical reports. • Under-performance is reviewed by CFO OPM's, project lead and contract managers. <p>Ixion:</p> <ul style="list-style-type: none"> • Gather and analyse equality data for recruitment and performance and take positive action to address gaps in achievement between different groups to achieve parity of outcomes for all customers • Project Managers and Project Lead collect monthly data which evidences the amount of participants, including age, race and sex. The figures are discussed at monthly performance meetings with CFO to ensure targets for each particular group are achieved. <p>Career Connect:</p> <ul style="list-style-type: none"> • Equality and diversity will be integral to the development of the service and we will monitor take-up of services – and the outcomes achieved – by these groups. • Individual contract teams are committed to monitoring performance targets for vulnerable and underachieving clients, with a particular focus on learners with LDD/ SEN and those from BME communities 	<p>CFO Staff: Statistics measured on a monthly basis</p> <p>Primes: As above</p>
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<p>Performance</p>	<p>Action that the projects will take in light of any under-performance</p>	<p>→ Any underperformance will be measured and monitored by the reports created by the Research Statistician. The OPM will arrange a meeting with the Provider to investigate the reason for under performance and work to develop a strategy to increase performance.</p> <p>→ If under performance continues CFO would place Providers on a performance review (PIP) to ensure delivery is improved.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • Performance is monitored by our Operation Managers and Team leaders and any underperformance will be discussed with the delivery teams to understand and rectify the root cause of any target deficit. • Performance targets and equality and diversity are key agenda items for our monthly meetings to ensure both good practice and potential areas of improvement can be identified and shared on a regular basis. This communication will be key to ensure early intervention can be administered to mitigate target shortfall and informed plans can be developed to focus on recovery. • Subcontracting through tier 3 provision will also be reviewed throughout the course of the contract. If demand is identified, new suppliers will be sourced to ensure specific participant groups have access to and are appropriately supported throughout the provision. <p>APM:</p> <ul style="list-style-type: none"> • APM monitor performance weekly. Any under performance is identified in the weekly forecasts, which is sent to delivery teams on a weekly basis. The forecasts highlights area of under-performance to allow employees/SCP to address at the earliest opportunity for action to be taken before moving to any formal Performance Management process. Any variance within the forecast will require a detailed response from the relevant delivery team. • As part of caseload management with teams and in the event of any underperformance, the relevant team/managers are supported through a Performance and Capability process with a personal improvement plan in place to address the shortfall/development area. • APM have two lead managers and responsibility is divided to ensure all aspects of the contracts are efficiently managed. Owen Peterson manages the APM internal delivery & Nicola Lennox manages the supply chain/partners of APM, and a robust SCP Performance Management process is in place to support partners delivery to the expected standards required. Michelle Taylor is the project lead and has responsibility for the APM contract as a whole. <p>Ixion:</p> <ul style="list-style-type: none"> • Ixion are committed to proactively preventing underperformance through a robust Supply Chain Management Framework designed to optimise early identification of issues, effective resolution of problems and provide a strong level of support for our Providers. • Performance is monitored on a weekly basis and Performance and Supply Chain Managers are allocated to Providers and act as designated point of contact; 	<p>CFO Staff: Performance measured on a monthly basis, problems will be identified and managed. This will be ongoing throughout the programme.</p>
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			<p>providing a range of support and performance monitoring and advice. Ixion's Regional Manager, Quality Manager, Finance Manager and Assistant Justice Director are actively involved in the monitoring and support of Providers throughout the month and all parties will meet directly with the Provider at least quarterly to discuss progress.</p> <ul style="list-style-type: none"> • Various tools are utilised by Ixion to manage the performance, focussing on early identification. If underperformance does occur, a structured Performance Improvement Plan is created with the Provider to breakdown issues into manageable and solvable elements that are addressed by the Provider and supported by Ixion. Should this PIP not be followed or successfully implemented then the reasons for this are explored and an Action Plan will be issued, setting out exact requirements and corrective actions that need to occur with corresponding timescales. Consequences of non-achievement will be discussed and documented, be this variations to contract or another method. • Ixion maintain a transparent and supportive relationship with their Providers throughout the process and actively work with them to ensure performance is in line with requirements. Proactivity rather than reactivity is embedded in our methods however our response, should underperformance occur is robust and responsive. <p>Career Connect:</p> <ul style="list-style-type: none"> • Board level reporting in place with quarterly review through the HR Taskforce. Last reviewed by Audit & Risk Committee on 22.01.16 	
<p>Review</p>	<p>Arrangements for reviewing the policy and implementation plan</p>	<p>→ The policy will be reviewed by SMT before being published to ensure information is accurate and reflects all relevant elements of E&D. The policy will also be endorsed by the Head of HMPPS CFO, Mark Nickson.</p> <p>→ The policy will be reviewed by the CFO Engagement Manger on an annual basis and any necessary amendments or policy updates shall be included.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> • A review of this policy will take place annually by the HR Department, unless other legal, contractual, specific business requirements, operational changes or events necessitate an earlier review. <p>APM:</p> <ul style="list-style-type: none"> • The approach to Equality and Diversity will be reviewed in accordance with the results shown by the monitoring. Best practice and benchmarking tools are utilised to assess the progress and position of the company. The HR Director and the HR & Training Manager in conjunction with the Senior Leadership team will work to implement changes when identified and required. <p>Ixion:</p> <ul style="list-style-type: none"> • The Group Finance & Corporate Services Director will review this policy on an annual basis to ensure that all updates to legislation are reflected, and 	<p>CFO: The policy will be annually reviewed and updated and released via the CFO website.</p>



		<p>→ Ensure the updated policy includes current legislation & shows an ongoing commitment to equality within the organisation</p>	<p>emerging best practice adopted, and will report back to the Board on the effectiveness of the policy to inform the agreement of new objectives and general recommendations for improvement if required.</p> <p>Career Connect:</p> <ul style="list-style-type: none"> As required in line with any new legislation or Code of Practice – or a minimum of every 12m as defined in our ISO 9001 schedule 	
Communication	How will the policy/plan be communicated to staff, participants and where necessary other suppliers	<p>→ The policy, once approved will be released to internal staff and prime Providers via a CFO bulletin.</p> <p>→ The policy will be accessible via the CFO3 website, where it is anticipated CFO staff, external and internal stakeholders and participants shall view.</p>	<p>Shaw Trust:</p> <ul style="list-style-type: none"> Management to ensure staff are aware of this policy and associated policies Participants informed via Case Managers as and when necessary Policy uploaded onto organisations website for wider audience to view <p>APM:</p> <p>APM has a number of methods for consulting with and involving staff including:</p> <ol style="list-style-type: none"> Employee Feedback Employee Survey Director visits Conference calls with CEO and Senior Team Company briefings/conferences and feedback sessions Cultural events Intranet information bulletins and information Interactive quality management system housing all company policies Performance and Development Review process Give as You Earn scheme Employee Recognition <p>Policies are available on the APM intranet</p> <p>Ixion:</p> <ul style="list-style-type: none"> Staff are informed during the Induction process the policy will be available on the Ixion Cloud shared drive for reference at any time Participants will be advised about this policy as part of their induction to the service they receive from Ixion. The policy will also be available on our website. <p>Career Connect:</p> <ul style="list-style-type: none"> included in the Staff Handbook, published on the Career Connect intranet which is fully accessible to all staff – any changes are highlighted via the weekly e-brief 	<p>CFO Staff: Upon completion staff & necessary suppliers will be informed in April 2016</p> <p>Primes: Staff informed at Induction phase. Participants notified during Induction phase & policy included on company website.</p>

