

Harshbir Sangha
Specific Duties – Policy review
Government Equalities Office Zone J9,
9th Floor
Eland House
Bressenden Place
London SW1E 5DU

Dear Harshbir,

I am writing, on behalf of NHS Wiltshire, to respond to the Specific Duties – Policy Review consultation which I believe closes on 21 April.

Firstly, I would like to welcome the shift from process to outcome proposed in the revised regulation on specific duties. I am also keen on the non-prescriptive approach to producing evidence in support of compliance.

I feel that the Government needs to issue clear guidance on type of information that public bodies are required to publish. In addition some guidance is needed on how a public body sets out to determine what is right for them. This guidance needs to be available before the specific duties come into force, otherwise public bodies will struggle to ascertain what is right. They will produce what they think is right rather than what their stakeholders might wish for. This will lead to significant variations in the quality and type of information published by different public bodies. Such an approach has the potential to confuse service users especially if they are accessing services from a variety of service providers within the same locality. Public bodies despite having made the effort to publish what they think is right may not be able to produce the required evidence in case of a legal challenge.

My second concern stems from the ability and willingness of service users to hold public bodies to account and public bodies' capacity to deliver expectations of the public. On the one hand people might find it hard to challenge because they don't know what to expect, or how to challenge effectively or they may find themselves in a vulnerable situation and do not want to upset "people in authority". On the other hand they may have very unrealistic expectations of what the public body can/cannot do. A transparent approach will help here but how will the Government manage public expectations, how will it educate the public to hold public bodies to account. Sharing this information with the public bodies at an early stage will help to ensure that they collect the right information, that there is consistency across the public sector so that it is easy for members of the public to see how a service provider/employer in their locality is doing compare with another locality.

It would be really good to have specific duties which are manageable and support public bodies to deliver tangible outcomes for protected group.

Thank you for the opportunity to air my views.

Yours sincerely,

Dr Parveen Sharma
Equality and Diversity Lead
NHS Wiltshire

**Chairman: Tony Barron
Chief Executive: Jeff James
Wiltshire Primary Care Trust**