

KEY DECISION? NO

**LOCAL GOVERNMENT ASSOCIATION EQUALITIES AND DIVERSITY PEER
CHALLENGE**

SUMMARY AND RECOMMENDATIONS:

This report presents the findings of the Local Government Association (LGA) Equalities Peer Challenge which took place in January 2021 and the draft Action Plan which has been developed in response to the LGA's recommendations.

Cabinet is recommended to:

- Note the Equality Peer Challenge Report (January 2021)
- Approve the draft Action Plan as attached at Annex B.

1. INTRODUCTION

- 1.1 In January 2021, at the request of the Council, the Local Government Association (LGA) carried out an Equalities Peer Challenge based upon the Equality Framework for Local Government. A written report detailing their findings and recommendations has now been received and a proposed response has been prepared.
- 1.2 The response takes the form of a draft Action Plan which sets out the proposed action to be taken by the Council on a phased basis over the next three years. This draft Action Plan has been considered by the Policy and Projects Advisory Board (PPAB) and the approach outlined in this paper has been endorsed and is recommended to Cabinet for approval.

2. BACKGROUND

- 2.1 In June 2020 the Council passed a Motion to record its solidarity in the fight against racism following the death of George Floyd in the USA and the subsequent Black Lives Matter protests across the world. The Council agreed to undertake an all-party review of its processes, policies and organisational attitudes regarding racism.
- 2.2 The Policy and Projects Advisory Board (PPAB) held a Special Meeting on 25 August 2020 to consider the scope and next steps to be followed by the Council in light of the Motion. The Board agreed that to support this work, an LGA Peer Challenge on Equalities and Diversity should take place as

soon as possible, with a view to any initial work being completed and recommendations prepared by the end of the 2020/21 Municipal Year.

- 2.3 The LGA Peer Challenge took place in January 2021 with LGA Peers undertaking two days of virtual meetings with Council staff, Members, community groups and partner organisations. The Peer Challenge was based upon the Equality Framework for Local Government and the team were asked to look specifically at Black and Minority Ethnic community issues rather than other protected characteristics.
- 2.4 The Peer Team for the Challenge included:
- Councillor Kam Kaur – Portfolio Holder for Customer and Transformation, Warwickshire County Council
 - Minakshee Patel – Corporate Equality and Diversity Advisor, Rugby Borough Council
 - Sam Johnson – Policy and Performance Manager, Bournemouth, Christchurch and Poole Council
 - Kirsten Burnett – Head of Policy and Organisational Development, Hyndburn Borough Council
 - Gill Elliott – Review Manager, Local Government Association
 - Harry Parker – Review Manager, Local Government Association
 - Esther Barrott – LGA NGDP Graduate and Shadow Peer
- 2.4 The Peer Challenge Team were provided with a range of background documents in advance of the review to supplement the two days of virtual meetings. The findings were presented to the Council on 28 January 2021 and all those who had participated in meetings with the Peer Team and all Members were invited to this session. This presentation and the written report (as attached at Annex A) have been structured in line with the four areas of the Equality Framework for Local Government, as follows:
- Understanding and working with your communities
 - Leadership and organisational commitment
 - Responsive services and customer care
 - A diverse and engaged workforce
- 2.5 The report makes 35 recommendations to the Council for consideration. These reflect conclusions drawn from the review of documentation and through the two days virtual ‘visit’ to the Council.
- 2.6 The report highlights a number of areas of good practice, along with an acknowledgement that the Council has made a good start, particularly with regard to how the Motion has been taken forward. The report also notes the Council’s “exemplary and long-standing work with the Nepali community”. The recommendations provide some suggestions to the Council on how this can be further built upon to improve work on equalities and diversity.
- 2.7 In their report, the LGA acknowledge that Covid 19 has resulted in additional pressures for Council staff and that it will be important not to

overwhelm staff with further additional work. The draft Action Plan (at Annex B) has been developed in this context with a view to this work being regarded as 'Business as Usual' in line with the LGA's recommendation.

3. Development of a Draft Action Plan

- 3.1 Following publication of the LGA's report in February 2021, work has been underway to review each of the recommendations made by the LGA and to consider the Council's possible response to each of the actions. This work is summarised in Annex B (draft Action Plan) which provides detail of each recommendation, the Council's proposed response and next steps to be taken along with timescales and identification of the lead officer for each piece of work. In most instances, the Council's proposed response aligns with the recommendations of the LGA although in a small number of cases, the management response proposes a different approach.
- 3.2 The draft Action Plan has been reviewed by the Council's Corporate Management Team (CMT) and the actions and timescales are considered to be deliverable. The draft Action Plan includes a number of significant actions which will take place over the next 6 months and will include work to embed equalities and diversity into existing relevant strategies and further develop the governance framework that already exists. Work will also take place to refresh the training offer available for Council staff and work is already underway to improve the levels of workforce data that is currently held. Over the course of the summer, it is also proposed that further resident survey work is undertaken in line with the recommendations in the LGA report. The aim of this early work will be to ensure that the Council has a strong and up to date foundation for continued and enhanced work on Equalities and Diversity.
- 3.3 There are a number of actions that are identified for delivery between September 2021 and March 2022. These are typically activities where there is a need to align with work that is already planned (for example, the launch of a new website or the planned refresh of the Procurement Strategy) or where there is a need for earlier work to be embedded (such as staff training). The timing of the release of Census data will also be critical to enhancing the Council's understanding and work with communities.
- 3.4 The draft Action Plan also identifies a relatively small number of actions which are proposed for delivery in the longer term. In light of the LGA's comments around phasing of implementation of actions, these are recommendations that may be best delivered following some of the proposed earlier work. The draft Action Plan proposes some indicative dates for these to be delivered.
- 3.5 It is intended that all next steps/actions identified in the draft Action Plan will be included and monitored through Service Plans and the template used for this has been updated so that this can be achieved.

Policy and Projects Advisory Board (PPAB)

- 3.6 The Policy and Projects Advisory Board (PPAB) have played a key role in taking forward work associated with the Council Motion since it was agreed in June 2020. A special meeting of PPAB was held on 25 August 2020 to consider the scope and next steps for this work and it was agreed that an LGA Peer Review should be conducted and that recommendations should be prepared by the end of the 2020/21 Municipal Year.
- 3.7 PPAB reviewed the draft Action Plan at their meeting on 24 March 2021 and gave their endorsement and support to the approach that is proposed. It was noted that the key theme of the proposed Action Plan was to build on progress that has already been made by the Council to promote community cohesion between different groups. The approach to embed a number of the actions into existing strategies, such as the Supporting Communities Strategy and the People Strategy, rather than creating a new document was supported.
- 3.8 The nature of the draft Action Plan was discussed by PPAB, recognising that some items of the document could be delivered relatively swiftly and other require further work and exploration prior to implementation. Members of PPAB stressed that understanding the critical path and dependencies in taking forward the draft Action Plan and officers have been considering this as Service Plans for 2021/22 are developed. The draft Action Plan provides a high-level framework for setting out next steps and additional detail would be set out in Service Plans and would be subject to further engagement and consultation where required. In particular, PPAB expressed a desire to be involved in community engagement type activity such as how the Council might celebrate events and festivals.
- 3.9 PPAB also sought reassurance regarding performance monitoring to ensure that the recommendations from the LGA report are progressed in a timely manner. It is intended that this will be picked up through the Council's usual Performance Management processes and recorded in relevant Service Plans. The Assistant Chief Executive, as the CMT lead officer will be responsible for tracking overall progress against the Action Plan. Over the longer term, there will be an opportunity for Overview and Scrutiny to consider progress against the plan and to explore further Peer Challenge reviews or accreditations to gain an independent view on the progress that the Council has made.
- 3.10 In advance of PPAB, the Chairman also received feedback from some of the community leaders in Rushmoor who had been involved in the Peer Challenge sessions in January. This feedback has been positive and has commended the Council in having taken forward the Peer Challenge and in the development of the Action Plan. Those who have responded have offered support, advice and guidance as the Council's work in this area continues.

4. IMPLICATIONS

Risks

- 4.1. There are not thought to be any key risks to the approach outlined in this paper the associated draft Action Plan. There is a potential risk associated with not taking forward a number of the recommendations set out in the LGA report as this some of these could leave the Council in the position of non-compliance with the requirements of the Public Sector Equality Duty. The proposed approach mitigates this risk.

Financial and Resource Implications

- 4.2. The draft Action Plan has been developed with a view to actions being delivered within existing budgets over a three-year period. Therefore, it is not thought that there will be any direct financial or resource implications arising from the proposals.

Equalities Impact Implications

- 4.3. The LGA Peer Challenge was commissioned in order to the give the Council and independent view on its Equalities and Diversity work. The recommendations provide a basis to build upon existing work and make further progress in this area. The recommendations have been based upon the areas set out in the Equality Framework for Local Government.
- 4.4. In some cases, elements of the draft Action Plan propose changes to existing policies, strategies or services and these will be subject to an Equalities Impact Assessment where required.

5. CONCLUSIONS

- 5.1. The LGA Peer Challenge report proposes 35 recommendations to the Council to consider and the draft Action Plan provides a framework for their associated implementation. The Peer Challenge report is informed by a range of input from both internal and external stakeholders to the Council and the draft Action Plan was been considered and endorsed by PPAB at their meeting on 24 March 2021.

BACKGROUND DOCUMENTS:

Local Government Association – Equality Peer Challenge Report January 2021
(Annex A)

Draft Action Plan (Annex B)

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Equality Peer Challenge
Rushmoor Borough Council

Peer Team Report

January 2021



1. Background

In June 2020 Rushmoor Borough Council (RBC) passed a Council motion to record its' solidarity in the fight against racism following the death of George Floyd in the USA and the subsequent Black Lives Matter (BLM) protests across the world. RBC pledged to eradicate racism and make its towns inclusive for all citizens. The Council agreed to undertake an all -party review of its processes, policies and organisational attitudes regarding racism. As part of that wider review the LGA was asked to carry out an equality peer challenge based on its Equality Framework for Local Government.(EFLG) The peer team were asked to look specifically at Black Asian and Minority Ethnic (BAME) issues rather than other protected characteristics.

The Equality Framework has four areas of performance. They are:

- Understanding and working with your communities
- Leadership and organisational commitment
- Responsive services and customer care
- A diverse and engaged workforce

The Peer Challenge is not an inspection; rather it offers an external assessment by critical friends who are subject experts and have experience of delivering an equality/diversity agenda in their own councils.

The peer team for the Challenge were:

Councillor Kam Kaur-Portfolio Holder for Customer and Transformation, Warwickshire County Council
Minakshee Patel - Corporate Equality & Diversity Advisor
Sam Johnson - Policy and Performance Manager, Bournemouth, Christchurch, Poole Council
Kirsten Burnett -Head of Policy and OD, Hyndburn Borough Council
Gill Elliott – Review Manager - Local Government Association
Harry Parker– Review Manager -Local Government Association
Esther Barrott – LGA NGDP Graduate and shadow peer

The peer team were provided with background documents and spent two days talking to a range of stakeholders including frontline staff, managers, Members, third sector and other partners as well as community representatives. The peer team would like to thank everybody that they met and spoke to during the process for their time and contributions.

Our findings were presented to the Council on 28th January 2021. This report provides some more detail to the findings including strengths and areas for consideration. We have made a number of recommendations, divided into the four areas of the Equality Framework. Many of the recommendations focus on

BAME issues as requested by the council in its scope. It is important that the Council, while addressing these issues, does not lose sight of the wider EDI objectives and looks at ways that its policies and actions can encompass all of the protected characteristics to ensure a robust and effective EDI strategy.

Executive Summary

The Black Lives Matter (BLM) motion passed by councillors in June 2020 is a visible public declaration and demonstrable commitment that RBC Members want to work together on Equality, Diversity and Inclusion (EDI) and BAME issues within the borough of Rushmoor and the Council itself. The motion has been a catalyst for activity within the council. The Board has set the following objectives for its overall work:

- Understanding current provisions, guidance and best practice
- Examining policies to ensure they reflect the above
- Complete the review of equalities policy and processes
- Reflect the provisions in the emerging People Strategy

We feel that the Council has made a good start. Its' Policy and Project Advisory Board (PPAB) made up of Members from all parties will be overseeing the work. Going forward, the Council now needs to develop some structure for EDI work so that it fits more clearly into the managerial and governance structure of the organisation and so that activities can be better co-ordinated. This will help to ensure there is proper planning and accountability for the work. There is currently no clear link between the organisation's Business Plan and its EDI agenda. Establishing that "Golden Thread" throughout corporate plans, policies and procedures will help to mainstream equality throughout the organisation.

The political and executive leadership understand the issues and want to see real changes for BAME communities and staff. However, its messaging in the past has been inconsistent. Ownership of the EDI agenda by Members and the Executive Leadership Team (ELT) needs to be strengthened and clarified throughout the Council and EDI needs to be a key corporate priority.

It is important to acknowledge that people are dealing with new ways of working arising from the Covid-19 pandemic, resulting in additional pressures. EDI is a significant work agenda, and it will be important to avoid overwhelming staff further with additional work. EDI needs to become part of "business as usual" at the Council so as not to become an extra burden. Working from home has required people to work very differently than before the pandemic, making far greater use of technology. This presents fresh opportunities for greater collaboration between staff and with Members, making it easier to work jointly on projects.

We heard that RBC has a strong “family” culture and that there are many staff with long service, which is an organisational strength. However, it can also mean that people may be rather “set in their ways” which could result in practices and behaviours that exclude some people. Consequently, it is important that the organisation’s culture is inclusive for all staff whatever their length of service, age, ethnicity or other protected characteristic. It is critical that all staff feel they belong within the ‘family’ and are able to “bring their whole selves” to work. Creating this culture will need to be a proactive process that is led from the top but involving all the staff and members.

The Council’s work with its Nepali community is exemplary and long standing. There are now estimated to be around 10,000 Nepalese people in Rushmoor since ex-Gurkhas were given leave to remain in 2010 and to bring their families to the UK. The community includes many elderly citizens and an increasing number of young people. It is recognised and appreciated that it is the largest ethnic minority in the borough, but we feel that there now must be a rebalancing of resources and activity to provide other smaller ethnic minority communities similar consideration.

RBC is seen as a good partner to work with but there is insufficient scrutiny from the Council on the outputs of initiatives it funds, which partners such as the Citizens Advice Bureau (CAB) and the Council for Voluntary Services (CVS) in Rushmoor are delivering. We also feel that the Council is not maximising opportunities to use its procurement power to benefit the community and progress the EDI agenda e.g., leveraging more social value from multi – million pound regeneration projects in the borough.

The Council has recently adopted a new People Strategy. We felt that it was rather “light” on EDI considerations and references and could be used to set equality objectives. The supporting action plan will need to ensure that EDI is being better addressed including a review of all HR policies and procedures. Better and more up to date workforce and community population data will help the Council to identify key areas of work and track progress. We were pleased to hear that work has already started on increasing the amount of workforce data collected.

The training offer on EDI is currently ad hoc and extremely limited for staff and Members. This is reflected in the low levels of knowledge and lack of confidence around EDI issues including the Public Sector Equality Duty. Much of what we found in the way of EDI policies, objectives and templates needs to be updated.

The use of equality impact assessments (EQIAs) is inconsistent across the Council. This leaves the Council open to legal challenge if due regard is not given to equality impacts when decisions are taken.

2. Recommendations

Leadership and Organisational Commitment

1. Develop an equalities strategy and a smart action plan to provide a framework for EDI work and governance across the Council; develop objectives, set timescales, manage accountability etc.
2. Establish a governance framework for EDI work, including the Equalities Group. Use the Overview and Scrutiny committee to scrutinise EDI policy
3. Identify lead officers for Engagement and EDI work. Staff were unclear about who has responsibility for these issues
4. Consider establishing a Cabinet Champion role for Equalities. There are Member Champions for other issues. An EDI Champion would signal that EDI is a Cabinet priority.
5. Bring EDI into the Council's performance management framework
6. Ensure that any Covid-19 Recovery Plan includes a BAME focus.
7. Review the EQIA template and process and roll out training for managers. Currently EQIAs do not take into consideration all the protected characteristics within the Equality Act 2010.
8. Develop an internal and external communications strategy that links into the Business Plan, and key strategies affecting BAME issues
9. Strengthen Service Level Agreements to link in with the Corporate priorities.
10. Sign up to the Race in The Workplace Charter. Doing so will signal nationally that the Council is committed to this agenda as well as gaining access to guidance.

Understanding and Working with Your Communities

11. Use existing published data and data shared with partners to build up a clearer picture of BAME communities in Rushmoor.
12. Use grant awards as leverage to become an effective enabler. Use this funding to improve participation and build BAME community capacity.
13. Broaden engagement with smaller communities and ethnic minorities beyond faith groups. An engagement strategy would assist with this.
14. Extend the good practice from the engagement/work done with the Nepalese community and ensure provision is available for other communities to support them to shape and access services

15. Refresh the EDI related content on the Council's website. Use it to signpost to community groups and other support.
16. Celebrate festivals and events internally and externally, for example Black History Month, Eid, Diwali, Pride etc.
17. Develop bespoke communications for different communities e.g., Covid-19 information for higher risk communities.
18. Work with partners to properly understand the health and wellbeing inequalities within the different BAME communities.
19. Provide formal feedback loops for BAME communities – they do not know where to raise issues.

Responsive Services and Customer Care

20. Review and develop data sharing protocols with key partners and communicate these across the organisation.
21. Ensure that services consider equality of access for all during service design, planning or redevelopment.
22. Review the council's approach to procurement to maximise impact on the EDI agenda.
23. Commission and analyse in-depth resident and customer surveys to gain a better understanding of the views and experiences of BAME people (and the other protected characteristics).
24. Adopt the principle of co-design and co-development of services with the users including minority ethnic communities.

Engaged and Diverse Workforce

25. Set aspirational targets for increasing the percentage of BAME staff in the council.
26. Roll out training programmes for staff on EDI, including some mandatory training, induction training and embed in other training as appropriate.
27. Develop Member training for EDI – consider making it mandatory.
28. Start addressing gaps in workforce data, recognising that not all staff will complete their data immediately and it may take several reminders
29. Start analysing trends in workforce data and addressing barriers to progression for BAME staff if this is an issue. Capture and understand the lived experience of BAME staff.
30. Adopt a positive action approach to advertising, recruitment and developing talent for career progression. Consider the reintroduction of formal and informal positive action initiatives for BAME people at all levels similar to earlier 'projects' that existed in a bid to increase the number of female leaders.
31. Consider how mentoring, coaching, sponsorship and secondment to partners and other local employers could improve diversity at senior levels.

32. Partner with community links e.g. Farnborough College to gain insight into what different segments of the community want from work and promote the Council as an employer of choice which can offer many careers.
33. Establish a BAME staff equality network with allies, sponsorship and a budget (depending on numbers and interest a BAME network could initially be part of a wider staff equality network).
34. Continue to identify opportunities to target the recruitment of apprentices - this could help to get a more representative workforce as well as help the council meet its apprenticeship duty.
35. Embed the behavioural framework in processes such as performance & development reviews. This could be refreshed to reflect EDI commitments.

3. Detailed findings

3.1 Leadership

Strengths.

The BLM Motion in June 2020 was a clear and public commitment from the Council Members that EDI is a key priority for the Council. The Policy and Project Advisory Board (PPAB) of members will be accountable for the delivery of the BAME review. Being cross party is a real strength for the organisation as many of the wards with the greatest deprivation and highest minority ethnic populations have Labour councillors.

As a council Rushmoor has been characterized as being rather “old fashioned” in its culture and ways of working. The Chief Executive, senior team and HR are all keen to bring Rushmoor up to date as an organisation and with regards to EDI. There is a good flow of information at a strategic level and the Corporate Management Team have a good understanding of equalities and are visible at community events. It is important that demonstrable and personal commitment to EDI is seen by the community and staff.

It is encouraging to see a high level of diversity amongst Members. The diversity of different backgrounds and ages adds value as it brings varied knowledge and experiences to their role and the Council and it is a real strength to have a broad body of opinions and attitudes to feed into the EDI agenda.

Partnership working during the Covid-19 pandemic has strengthened relationships and provided a strong basis for taking other initiatives forward. The new Supporting Communities Strategy has the potential to deliver real improvements for BAME and other deprived communities.

Areas for consideration

EDI needs to be embedded in all relevant strategies. e.g. Communications Strategy and Council Business Plan. The Council's new Business Plan does not express the Council's commitment to EDI, making it feel more like an add-on than a priority. This could be addressed by publishing a re-refresh of the Plan and by ensuring there is a better connection between the communications strategy and the Business Plan.

There is no governance structure in place for EDI in the organisation. For example, there is no established scrutiny mechanism for EDI. This could be addressed by using task and finish groups within the Overview and Scrutiny Committee or having an annual EDI report to scrutiny. The new EDI group that was established in late 2020 has no formal reporting links to the corporate management team for reporting progress on issues or seeking a steer on activities. It needs to be brought into the governance structure with reporting lines to the corporate management team. There needs to be a 'Golden thread' of EDI through the organisation, which is owned by the Members as well as staff

There is no Member training offer on EDI at present which is a significant gap. Members understand the importance of EDI but lack understanding and knowledge about what it means in practice and how they can use their role as community leaders to empower all local communities, engage better with BAME residents and build vision and direction for the organisation's equality work into the Council's priorities.

Corporate ownership for the emerging EDI agenda is not well understood by staff throughout the organisation. Our small survey of what staff thought of the council's approach to EDI produced words like "variable" "lacking" "open" "engaged" "developing" "unknown" and "not very visible" "under supported" "patchy" amongst others.

People we spoke to feel that the Council is well intentioned and good at addressing problems with communities when they arise, but that it needs to be more proactive in understanding and seeking out issues before they become a problem.

Equality objectives for the organisation are not up to date and it is not clear what progress has yet been made to achieve them. The single equality objective on the Council's website dates from 2018. The Council needs to develop an equality strategy with revised objectives and an action plan to deliver them.

Staff do not always know how to apply equalities considerations to services and policies. Their knowledge needs to be broadened so that equalities can be more embedded throughout the organisation. Including EDI in the corporate

performance management systems will also help this process. Service planning and performance monitoring needs to consider equality implications. The staff performance/development appraisal process should also address equality. This may be by assessing training needs or setting objectives.

Equality Impact Assessments (EQIA) are not routinely undertaken and there is no oversight of their quality. The EQIAs that we saw only addressed six protected characteristics not the nine included in the Equality Act 2010, so are outdated and inadequate. It was also not clear that all Cabinet/Council reports have EQIAs attached. Both these factors leave the council at risk of non-compliance with the requirements of the PSED.

3.2 Understanding and Working with Your Communities

Strengths

The Council has a strong and proud history of working and engaging with the Nepali community, as evidenced by the town being twinned with Gorkha District, Nepal. Nepali representatives feel that the council listens to them and takes account of their needs in the way services are provided.

The Council has tried alternative means to engage with some minority ethnic groups through other service providers such as shops used by Romanian and restaurants used by African Caribbean communities.

There are good links between the council and the borough's religious leaders and their communities. The Council contacted community groups after tensions caused by the EU Referendum, and this led to creation of the Strength in Unity Faith Forum. Community representatives commented that their experience of dealing with the Council was more positive than many connected groups had benefitted from in other parts of the country.

The Council has had some success in improving engagement and community cohesion across a wider range of communities through events such as the multi-ethnic food festivals and the local lottery grants process. There are some good examples of wide-ranging public consultations including the Civic Quarter redevelopment in Farnborough and the recent Council website re-design project.

The Council has a quarterly newsletter which is sent to all 41,000 households; an audio version is also produced. This is a significant asset but it could be used more proactively as part of establishing the council's corporate identity and enabling smaller communities to feature and share their culture with the wider community.

The Council chairs the borough's cohesion forum and the council has been described as "excellent" in managing community tension, particularly when large numbers of Nepalese people moved into the borough after 2010 and proactively 'myth busting', and bringing communities with competing interests closer together.

Areas for Consideration

There is a lack of scrutiny and monitoring from the Council on the outputs of initiatives it funds partners to deliver. We heard that CAB and the Rushmoor Council for Voluntary Services (CVS) receive £250,000 annually from the Council to deliver services to residents and community groups. There are no formal service level (SLA) agreements in place and very little monitoring of the outputs or outcomes. This is a significant amount of money for the Council and it is vital that the money being spent is delivering on corporate priorities. Having SLAs would help to keep track of the spend and enable the Council to determine what services should be delivered, and it could be used to 'piggy back' on the resources of partners such as the vast bank of volunteers used by CAB to share information across their networks.

Engagement with BAME residents/communities other than the Nepali is less well developed. Some community leaders commented that they find the Council easy to work with and its officers accessible. Others said that it took an event before they really got to know or talk to the Council. There is no strategy in place to find ways to broaden engagement with smaller ethnic communities beyond faith groups. No "roadmap" exists for engaging with community groups to deliver the Council's new Supporting Communities Strategy. There is also no formal feedback loop for communities. They told us that they do not know where and how to raise issues with the Council. Representatives of BAME communities said that residents want the Council to be more transparent.

There is a lot of information and data available on ethnicity and deprivation e.g., ward profiles, Office of National Statistics (ONS) reports; Joint Strategic Needs Assessment (JSNA), Schools data etc. These need to be more widely known about and used across the Council in the design and delivery of its services. We understand that at one school in Aldershot over sixty different languages are spoken. Data is not routinely shared with partners and we did not hear about any data sharing protocols e.g. health, fire service; police. The Council needs to better understand and communicate what data can be shared and with whom. We found a lack of specific data about the views of the BAME community in surveys that take place. Results of resident surveys are not disaggregated by protected characteristics. The 2020 Coronavirus and You survey gathered data on respondent's diversity but only age featured in the results as a separate protected characteristic.

Communications with communities is not well targeted e.g., Covid-19 information for higher risk communities. The Council does not communicate well what it does for groups other than Nepalese. The Council's website has no signposting information for residents to access community groups or specialist support

The Council could participate more regularly in celebratory occasions via its social media platforms/internal and external communication functions. E.g. Black History Month/Diwali/Eid / Pride. This would be way to signal the Council's commitment to EDI issues that are important to different communities.

3.3 Responsive services and customer care

Strengths

It was clear that there are pockets of good practice across Rushmore. However, they exist in isolation and new knowledge and learning is not routinely shared among peers. Response to Covid-19 with the Nepali community has been very good. Access to services have been changed to meet the needs of elderly Nepalese residents e.g., Nepali speakers have been employed in front facing teams such as customer services and engagement and access consequently improved. Nepali speakers are being used to staff the Revenue and Benefits telephone line during the pandemic to ensure trusted voices could improve messaging in response to the cultural belief that it was "Shameful if you had Covid-19" and because elderly Nepalese residents were the greatest in-person users of the contact centre before the pandemic.

Co-location of Citizens Advice Service within the Council building has had benefits for Council service users coming into the contact centre, allowing them to access advice and other services in a single visit. This is important because many of the service users coming to the centre are elderly and rely on public transport.

We heard of successful bids to secure funding from the Ministry for Housing Communities and Local Government (MHCLG) which were used by partners to integrate community adjustments to services and work undertaken to gain an early understanding issues to improve health outcomes; the NHS being commissioned to deliver key messages to communities through various social media platforms such as Facebook and Viber.

We heard some really good examples of how services have been developed to meet needs of diverse communities e.g. Nepalese cremation protocols; officers door knocking to seek out housing issues among young Romanian men in particular; access to housing and accommodation for ex-Armed Forces personnel; and the employment Nepali speaking staff at polling stations.

There are good processes in place to respond to the Gypsy, Roma Traveller communities. We also heard of a good flow of information and engagement at a strategic level around Hate Crime and robust scrutiny processes and increased reporting and increased confidence within communities affected. A project has been undertaken with the Citizens Advice Bureau on the recording of Hate Crime and its finding reported to the Councils Overview and Scrutiny Committee.

Work is underway in partnership with the Arts Council to build a Cultural Compact and Strategy and the local lottery has been used to improve engagement and increase participation.

Areas for consideration

Data exists but is not always well used for service planning around community needs, except for the Nepali community. The impact of decisions about services is routinely considered for the Nepali community but this cannot be evidenced across other groups. The Council needs to ensure that EDI work and data collection includes all protected characteristics to avoid having to duplicate / redo training and other processes.

Council services are highly professional but do not always consider the issue of equality of access or outcome for all during service design or redevelopment. Lack of language skills prevents some Nepali residents from using certain professional building services offered by the council, meaning they have a lack of choice compared to English speakers. Staff want to give a good service to diverse clients but need training to really equip them to do it well. There is a lack of confidence amongst staff around use of language and how to manage difficult conversations with customers and other staff who have different cultural needs. The Council uses the Learning Pool e-learning system. This has a number of courses to support EDI which could be quickly utilised.

There is a lack of understanding about how procurement processes can be used to further equalities in the borough. Some EDI questions are asked at the pre-tendering stage but there was little evidence of contract monitoring around EDI once a contract is in operation. There was little evidence of using procurement to benefit local suppliers or improve access to employment for people from a BAME background. There are some multi-million-pound redevelopment contracts within the borough that the Council awards and these can offer opportunities for to use these contracts to generate greater social value including EDI benefits.

There is little evidence that the views of customers are always being captured or understood as some services had “never had a complaint”. Where issues were identified for service users the response was often good for an individual customer, but issues are not picked up on a wider scale so that trend data is available for analysis and lessons learnt to improve customer experience and service delivery in future. Customer satisfaction surveys that do take place are

not always capturing the views of diverse customers, nor are the results shared across the organisation. E.g. a recent Serco customer survey did not report any BAME specific results.

The Armed Forces Covenant is well known and used by some services such as Housing. However, its' principles need to be more embedded across other services in the council.

3.4 Diverse and engaged workforce

Strengths

The Council has a long-standing workforce - they describe a caring and friendly working environment that is "like a family". Key officers reported a genuine enthusiasm to receive feedback and make improvements and suggestions on EDI issues. This is a real strength because any culture change initiatives to make the council more inclusive will need to harness employee's ideas and interest if it is to be successful.

The council has responded well to addressing the needs of staff during the Covid-19 pandemic. The impact of delivering services differently and effect on staff due to Covid-19 is recognised by the senior leadership. Staff said that they felt that their needs were "definitely a priority" for the council in terms of health, wellbeing, use of technology and new ways of working. Employees said that they have been supported with Covid-19 risk assessments and health needs on an individual basis and these have been taken account of.

The Human Resources team has already begun to consider what actions it will need to take to ensure EDI is mainstreamed in the organisation. EDI training has been identified as a priority within the People Strategy and HR already has plans to start addressing gaps in its workforce data.

There is a process in place to identify opportunities to recruit apprentices. This could help to get a more representative workforce quickly and help the council meet its apprenticeship duty.

Positive action has been undertaken to increase the number of women who work within information Communication Technology.

Staff pulse surveys have been helpful in identifying immediate needs and actions during the pandemic. They could also be used to capture feedback about specific issues relevant to equality.

There has been an increased emphasis on learning and development in recent times however, this has not carried through to learning and development around EDI.

Areas for consideration

We felt that the People Strategy which has recently been adopted is "light" on EDI considerations. We understand that the strategy's action plan will include specific equality related measures. Holding some EDI focus groups within the Directorates would help staff take ownership of the strategy.

Collection rates of workforce data needs to be increased significantly to cover the protected characteristics. No data was available on where BAME staff are employed in the council or at what grades. Data must be analysed for trends to see where the barriers to employment and progression are so they can be addressed. Workforce representativeness of BAME employees is extremely low compared to the population. 2.2% employed (People Strategy) v 14% population (2011 Census). We understand that the number of BAME employees is more likely to be around 8%. However, the 2021 Census is likely to show that the BAME population has also increased.

There is no EDI training currently available to staff or Members. This needs to be addressed and a training strategy for EDI put in place. Training should be available at the induction stage as a minimum and all employees should have some mandatory EDI awareness training. Anyone taking part in recruitment or selection should have training so that they understand the legal requirements as well as best practice. Consideration should be given to some mandatory training for Members.

The recruitment process from advertising through to job offer is not monitored by protected characteristics. This should be the starting point for a review of the recruitment and selection processes in the organisation. There will also need to be a refreshed recruitment and selection training for managers which includes equalities.

There are no systems in place to collect and analyse employment data across a range of practices: training, leavers, grievance; capability and disciplinaries etc. This is important because although rates of discipline and grievance are low at RBC other councils have found through monitoring, that BAME employees are often disproportionately involved in these processes and have poorer outcomes.

Race and disability pay distribution within the Council is not calculated. This would help to look at where and at what levels BAME staff and other staff with protected characteristics are employed.

The staff appraisal process at RBC is aimed at development rather than performance. This is clearly what the Council feels works best for them. However, not including a performance element means that equality related objectives cannot be set, and the process does not properly encompass the Council's behavioural framework.

4. Signposting to good practice elsewhere

Equality Impact Assessments

Rochdale Council *has a robust* system in place for ensuring that equality impact assessments are undertaken when required and for quality assuring these assessments. It implemented the Mod Gov electronic report management system in June 2014 which ensures that all reports meet Council requirements and are checked and signed off by Legal, HR, Equality, Finance and the Relevant Director of Service before the report proceeds to the relevant committee meeting. Ongoing advice and feedback are provided to managers on the quality of their equality impact assessments.

Bournemouth, Christchurch Poole (BCP) Council have a good practice guide for the development of equality impact assessments and can provide an Equality Impact Assessment Template that has several prompts to support the authors in their development.



EINA
Guidance.docx



EINA Guidance.doc



A Good Practice
Guide for EINAs A R

Rugby Borough Council EQIA Guidance Toolkit



Equality Impact
Assessment form



Equality Impact
Assessment Guidance

Working with and Supporting BAME Communities

BCP Council has set up a commission to help improve the way it works with and supports Black, Asian and Minority Ethnic (BAME) individuals and communities.

[BCP Council Equality Action Commission](#)

EDI Governance

We recommended that RBC establish a governance framework for its EDI work. This example is from BCP Council.



Agreed
Governance of Equa

Equality Strategy and Objectives

Hyndburn Council updated its E & D Strategy in 2020. This includes a number of equality objectives: <https://www.hyndburnbc.gov.uk/download-package/our-equality-and-diversity-scheme-2020-2025/>

Race Equality Matters - a Community Interest Company formed in response to the Black Lives Matter Movement to turn declarations of commitment and support from organisations and individuals into meaningful change in racial equality both in the workforce & in society. Their **Race Equality Network** can provide **free** services, insight, opportunities to collaborate and training materials to ethnic minority network Chairs.

<https://www.raceequalitymatters.com/about-us/>

Race at Work Charter - Organised by Business in the Community. Its website has a wealth of resources on all aspects of equality in the workplace including Race

<https://www.bitc.org.uk/report/the-race-at-work-charter-one-year-on-2019/>

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Annex B – draft Action Plan**Leadership and Organisational Commitment**

LGA Recommendation	Management Response	Next steps	By when?	By whom?
Develop an Equalities Strategy and smart action plan to provide a framework for EDI work and governance across the Council; develop objectives etc.	<p>Embed this in existing work rather than create a separate Equalities Strategy.</p> <p>The People Strategy and Supporting Communities Strategies could provide the framework for the Council's future work in this area.</p> <p>The Vision and Values work also represents an opportunity – this work is currently being undertaken, to be completed by May 2021. Work will follow to translate the values to a Behaviours Framework and embed in all the Council's day to day activities. Referencing EDI in the values work would represent a very significant step to ensuring EDI is not just a policy/procedure but also forms part of the Council's everyday thinking, conversations and work.</p>	Explore whether this recommendation can be achieved in this way. Following this, relevant documents can be revised.	<p>Review by May 2021</p> <p>Updated documents by September 2021</p>	<p>Review – Strategic and Corporate Policy.</p> <p>Updated documents – Corporate Manager – People and Head of Democracy and Community.</p>
Establish a governance framework for EDI work, including the Equalities Group. Use Overview and Scrutiny Committee for scrutiny of EDI	<p>Governance framework to be in line with management arrangements – Equalities Group through to CMT and Cabinet.</p> <p>Lead CMT Officer to be Assistant Chief Executive.</p> <p>Member Scrutiny through Overview & Scrutiny.</p>	Brief Equalities Group & CMT.	March 2021	Strategic and Corporate Policy

Identify lead officers for Engagement and EDI work	Lead officers are members of the Equalities Group and the Assistant Chief Executive.	Brief Equalities Group & CMT.	March 2021	Strategic and Corporate Policy
Consider establishing a Cabinet Champion role for Equalities	To be considered by the Cabinet as part of their response to the Peer Challenge.	To discuss informally with the Leader and Deputy Leader.	May 2021	Chief Executive
Ensure that any Covid-19 Recovery Plan includes a BAME focus	Covid 19 recovery plans will include a focus on EDI and will be subject to an Equalities Impact Assessment.	To be taken forward as part of the Business Planning and Service Planning process.	June 2021	Strategic and Corporate Policy
Review the EQIA template and process and roll out training for managers.	To be actioned as a priority to support decisions taken by the Council.	To seek LGA guidance on good practice models	March 2021 for template and training to be rolled out by June 2021.	Strategic and Corporate Policy
Develop an internal and external communications strategy that links into the Business Plan, and key strategies affecting BAME issues	To be considered as part of a possible future LGA Peer Review of communications. A communications/engagement strategy can be developed in light of the findings of this work.	LGA Peer Review on Communications to take place in 2021/22	Following Peer Review	Corporate Manager - Communications (external communications) Corporate Manager – People (internal communications)

<p>Strengthen Service Level Agreements to link in with the Corporate priorities.</p>	<p>Agreed, to be taken forward as SLAs due for renewal.</p>	<p>To establish when relevant SLAs are due for renewal</p>	<p>Update on current SLA position to be provided by April 2021.</p>	<p>Head of Democracy and Community.</p>
<p>Sign up to the Race in the Workplace Charter</p>	<p>To be considered at a later date. There are a number of accreditations/Charters that could be considered and it is proposed that the Council reviews this at a later date.</p>	<p>HR to consider and report back to CMT in due course</p>	<p>April 2022</p>	<p>Corporate Manager – People</p>

Understanding and Working with Your Communities

LGA Recommendation	Management Response	Next steps	By when?	By whom?
Use existing published data and data shared with partners to build up a clearer picture of BAME communities in Rushmoor.	Agreed. After the release of the 2021 Census data the Council will produce a report to create a clearer picture of the BAME communities in Rushmoor. This report will be shared with partners via the Partnership Network.	To follow the release of Census 2021 data	Autumn 2021 onwards (dependent on the release of Census data)	Strategic and Corporate Policy
Use grant awards as leverage to become an effective enabler. Use this funding to improve participation and build BAME community capacity.	Agreed. Suggested next step to review where are able to use some grant awards to potentially support an Equalities, Diversity and Inclusion agenda. This work could potentially be included in the scope of a Community Engagement Strategy.	Democracy and Community Service to review and advise CMT of potential options.	2021/22 for implementation in 2022/23	Democracy and Community Service
Broaden engagement with smaller communities and ethnic minorities beyond faith groups. An engagement	Agreed. Given the timing of the Census, it might be worthwhile developing any Community Engagement Strategy following the publication of the Census.	To follow the release of the Census Data and to consider as part of the Communication s Strategy work	Autumn 2021 onwards (dependent on the release of Census data)	Corporate Manager – Communications Head of Democracy and Community

strategy would assist with this.				
Extend the good practice from the engagement work done with the Nepalese community and ensure provision is available for other communities to support them to shape and access services.	Agreed and propose that this is taken forward following the publication of the Census data.	Democracy and Community Team to consider	Autumn 2021 onwards	Head of Democracy and Community
Refresh the EDI related content on the Council's website . Use it to signpost to community groups and other support.	Agreed. This can be taken forward as part of the planned implementation of a new Council website.	Ensure that this is on the work plan for new website.	2021/22	Corporate Manager - Communications
Celebrate festivals and events internally and externally , for example Black History Month, Eid, Diwali, Pride etc	Agreed. This can start to be implemented quickly and can be developed further as time goes on. The LGA proposed a first step around social media which can be taken forward by the Communications Team.	Calendar of festivals/celebrations to be developed.	Implementation can commence in March 2021 starting with International Women's Day.	Corporate Manager – Communications Head of Democracy and Community
Develop bespoke communications for different	Arguably, this is an area where the Council have already been focused and will continue to do so. Work could be expanded in this area but would	Maintain watching brief.	In place already	Corporate Manager - Communications

communities e.g. Covid 19 information for higher risk communities	need to be informed by data around which groups to target for communications.			
Work with partners to properly understand the health and wellbeing inequalities within the different BAME communities	Arguably, this is an area where the Council have already been focused and will continue to do so.	Add to the scope of the internal review that will commence on health.	2021/22	Executive Director (KE) Head of Democracy and Community.
Provide formal feedback loops for BAME communities – they do not know where to raise issues.	To be considered as part of the work on the Community Engagement Strategy/Communications Strategy.	Add to the scope of the relevant documents	2021/22	Corporate Manager – Communications Head of Democracy and Community

Responsive Services and Customer Care

LGA Recommendation	Management Response	Next steps	By when?	By whom?
Review and develop data sharing protocols with key partners and communicate these across the organisation	To be reviewed as the Council's view is that data sharing protocols are in place and this may just be an issue around communication. Need to understand these before deciding whether further work is required.	Understand what is already in place before agreeing next steps.	July 2021	Corporate Manager – Legal
Ensure that services consider equality of access for all during service design, planning or redevelopment	This will require training, documentation and templates (e.g. EQIA) to be developed along with cultural change. All of these are identified elsewhere in the LGA's recommendations and this should then result in services fully considering equality of access. This may be an area for the lead officer and Member Champion to have oversight around progress.	To launch EDI training and to refresh equality impact assessment guidance and templates and to consider incorporating EDI into our vision and values as they emerge.	December 2021 onwards	Corporate Manager – People Assistant Chief Executive
Review the Council's approach to procurement to maximise impact on the EDI agenda.	To be considered when the Procurement Strategy is refreshed (planned for 2021/22)	Add to the scope of the refresh.	2021/22	Principal Procurement Officer

<p>Commission and analyse in-depth resident and customer surveys to gain a better understanding of the views and experiences of BAME people (and other protected characteristics)</p>	<p>Resident satisfaction survey is planned for Summer 2021 and can include questions which address this recommendation.</p>	<p>Design survey and liaise with the communications team</p>	<p>September 2021</p>	<p>Strategic and Corporate Policy Team</p>
<p>Adopt the principle of co-design and co-development of services with the users including minority ethnic communities</p>	<p>The Council has examples of where this approach has been used successfully. We would need to think about how and where we might adopt this approach more widely and it might be more appropriate to consider once training and EQIAs are embedded.</p>	<p>Keep under review</p>	<p>From 2022/23 onwards</p>	<p>Strategic and Corporate Policy Team</p>

Engaged and Diverse Workforce

LGA Recommendation	Management Response	Next steps	By when?	By whom?
Set aspirational targets for increasing the percentage of BAME staff in the council	The Council doesn't wish to take positive action in terms of appointments or set targets but will look at initiatives to encourage applications from under-represented groups.	Initiatives to encourage applications from under-represented groups to be taken forward following a review of recruitment analytics, as identified in People Strategy	April 2021 onwards	Corporate Manager – People
Roll out training programmes for staff on EDI, including some mandatory training, induction training and embed other training as appropriate.	To take forward as a priority action and already identified in the Corporate Learning and Development Plan	Identify training provision and roll out to all staff. Review additional training needs.	April 2021 onwards	Corporate Manager – People
Develop Member training for EDI – consider making it mandatory	A decision for Members on whether they wish to take this recommendation forward.	Refer to member Development Group for consideration	June 2021	Service Manager – Democratic Services

<p>Start addressing gaps in workforce data, recognising that not all staff will complete their data immediately and it may take several reminders.</p>	<p>Priority action that had already been identified in the People Strategy.</p>	<p>Request to be sent to all staff.</p> <p>Baseline position to be established</p>	<p>February 2021 onwards</p>	<p>Corporate Manager – People</p>
<p>Start analysing trends in workforce data and addressing barriers to progression for BAME staff if this is an issue. Capture and understand the lived experience of BAME staff.</p>	<p>To follow the action above.</p>		<p>2021/22</p>	<p>Corporate Manager – People</p>
<p>Adopt a positive action approach to advertising, recruitment and developing talent for career progression. Consider the reintroduction of formal and informal positive</p>	<p>Not agreed at this stage. Any approach in relation to this recommendation would need to be underpinned by data (on workforce, recruitment etc) as well as an understanding on how this has worked in other organisations.</p> <p>Recruitment processes in a broad sense to be looked at as mentioned above as part of the work under the People Strategy and will consider EDI issues.</p>			

<p>action initiatives for BAME people at all levels similar to earlier projects that existed in a bid to increase the number of female leaders.</p>				
<p>Consider how mentoring, coaching, sponsorship and secondment to partners and other local employers could improve diversity at senior levels</p>	<p>Incorporated already as part of the Learning and Development Strategy.</p>		<p>Completed</p>	<p>Corporate Manager – People</p>
<p>Partner with community links e.g. Farnborough College to gain insight into what different segments of the community want from work and promote the Council as an employer of choice which can offer many careers.</p>	<p>To be taken forward as part of the People Strategy Action Plan.</p>		<p>2022/23</p>	<p>Corporate Manager – People</p>

<p>Establish a BAME staff equality network with allies, sponsorship and a budget (depending on numbers and interest a BAME network could initially be part of a wider staff equality network.</p>	<p>The Council already has an Equalities working group and could be tasked with giving consideration of whether an Equalities Network would be useful.</p>	<p>To be considered by the Equalities Working Group</p>	<p>September 2021</p>	<p>Equalities Working Group</p>
<p>Continue to identify opportunities to target the recruitment of apprentices – this could help to get a more representative workforce as well as help the council meet its apprenticeship duty.</p>	<p>To be considered as part of the People Strategy Action Plan</p>		<p>2021/22</p>	<p>Corporate Manager – People</p>

<p>Embed the behavioural framework in processes such as performance and development reviews. This could be refreshed to reflect EDI commitments.</p>	<p>To be considered as part of the People Strategy Action Plan and work on values</p>		<p>2021/22</p>	<p>Corporate Manager – People</p>
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