

Equality Framework and Action Plan 2020/23

Introduction

- 1.1 This Equality Framework and Action Plan 2020/23 has been prepared with reference to the LGA Equality Framework for Local Government 2020 version, which is intended to help Councils:
 - deliver accessible and responsive services to customers and residents in their communities including those from protected characteristics;
 - employ a workforce that reflects the diversity of the area they are serving;
 - provide equality of opportunity for all staff; and
 - meet the requirements of the Public Sector Equality Duty.
- 1.2 The LGA Equality Framework seeks to do this by:
 - Identifying the areas of activity that Councils need to be address to deliver good equality outcomes.
 - Helping Councils to understand how they can build equality into processes and practices.
 - Supporting organisations to become inclusive employers.
 - Enabling Councils to informally self-assess their progress on the equality improvement journey and determine where and how they need to improve.
 - Providing the framework for an LGA Equality peer challenge.
- 1.3 The Framework sets out four modules for improvement underpinned by a range of criteria and practical guidance that can help a Council plan, implement and deliver real equality outcomes for employees and the community. The four modules are:
 - Understanding and working with your communities
 - Leadership and Organisational Commitment
 - Responsive Services and Customer Care
 - Diverse and Engaged Workforce
- 1.4 For each module there are three levels: Developing; Achieving and Excellent.

 The levels are progressive and cumulative so an organisation can plan and chart its progression against different priorities.
- 1.5 The following high level Framework and Action Plan assesses the Council against the 'Developing' level criteria and identifies areas for further improvement. It demonstrates that the Council has made an organisational commitment to improving equality; has, or is putting in place, processes to deliver on equality issues and meet statutory requirements; and is working towards exceeding those statutory requirements. It sets out the action the Council intends to take over the period 2020-23 and will be underpinned by a detailed operational action plan which identifies responsible officers and timescales for delivery.

UNDERSTANDING AND WORKING WITH YOUR COMMUNITIES

Collecting and Sharing Information

The organisation has gathered and published information and data on the profile of its communities and the extent of inequality and disadvantage. Plans are in place to collect, share and use equality information with partners.

Criteria:

The organisation is clear about what sources of information (both local and national) are relevant and useful.

The organisation knows what information is already being collected – internally and by its partners, including voluntary and community sector stakeholders.

Some information and data has been gathered and published.

The organisation is working with its partners to ensure information is shared effectively.

Partners ensure efficient collection of data that avoids duplication.

The authority is compliant with GDPR legislation in its collection, analysis storage and use of data and information

The Council already has the following in place to demonstrate commitment:

A Data Hub is available on the intranet which provides an easily accessible online portal for access to data that will inform and evidence decision-making, service planning and other project work. This ensures it is easily accessed, shared and used by departments across the Council. It includes an array of information such as population, health, housing, education, mosaic and economy data. It includes Gedling Insight information and specifically data from the 'Gedling Conversation' Residents' Satisfaction survey. The information is from the Council's own sources or a range of external sites and is available at borough, ward and lower output areas levels.

Specifically data is captured about health inequality, including Public Health England data, Primary Care data, Nottinghamshire County Council Public Health data together with local qualitative knowledge from working in communities.

We also gather and collate data to help inform delivery of key projects in the Gedling Plan, for example specific data re health and wellbeing and data to inform the Sport and Physical Activity Strategy.

In accordance with equalities legislation, equalities information is gathered and published on an annual basis on the Council's website.

The Council also recognises that its partners collect relevant information in particular, the Primary Care Network Health profile data which identifies health need and Joint strategic needs assessment conducted by the County Council. These data sources are used to direct the Council's work.

The Council is currently working with Newark CVS which has been commissioned by the CCG to obtain insight to understand the local community sector supporting address health inequalities and access to healthcare.

Recognising that we work in a complex environment the Council does seek to ensure information is shared with partners effectively. The Gedling Health and Wellbeing partnership has considered equalities data and agreed actions as part of the Health and Wellbeing Plan as a partnership to address inequality. In addition, at the first Interfaith Forum meeting, it was agreed that the Council would share key equalities data to inform discussion.

The Council does share relevant data with voluntary sector organisations to support bids for funding, where requested. Gedling Insight information is also published on the Council's website.

The Council has procedures in place to ensure it is compliant with GDPR legislation in its collection, analysis storage and use of data and information. There are also robust and effective data sharing protocols in place for sharing information between partners and to ensure compliance with data protection legislation.

The Council intends to take the following action to demonstrate further commitment:

- 1) Ensure all equalities data held or collected is published on the data hub.
- 2) The Council does not currently collect data in respect of all the protected characteristics and should consider whether additional data should be collected and how. Any data collection must be GDPR/DPA compliant.
- 3) The Joint Needs Assessment data includes useful data but due to lack of resources the Council does not have the capacity to go through it in as much detail as it could. It could be analysed in depth and used more in strategic planning.
- 4) Update the Community page of the Council's website to ensure Gedling Insight information is easily accessible to voluntary and community organisations. Recognising there is a gap in relation to data held by voluntary and community sector stakeholders due to the lack of a local CVS, consider whether any additional data needs to be shared on this page.
- 5) Participate in the planned government intention to produce Ethnicity Pay Gap data.
- 6) Review the Equality and Diversity Monitoring Form to ensure consistency of data collection.

Analysing and using data and information

Systems are being developed to analyse soft and hard data/intelligence about communities, their needs and aspirations.

Criteria:

The organisation is developing and improving systems for collating and analysing the different sets of data being collected.

Information is collected by front-line staff or key decision makers and taken account of.

The authority is compliant with GDPR legislation, analysis and use of data and information

The Council already has the following in place to demonstrate commitment:

Equality information is collected by Organisational Development, Housing Needs and Leisure, reported to Senior Leadership Team and published on the Council's website.

The Council has procedures in place to ensure it is compliant with GDPR legislation in its collection, analysis storage and use of data and information.

The identification of equalities objectives is embedded in the Service Plan/Gedling Plan preparation process. These objectives have been identified following a SWOT analysis. The datasets used as part of that SWOT analysis includes equalities information.

Actions identified to deliver those equalities objectives are subject to the same performance management process as other objectives in the Gedling Plan and Service Plans. Progress against the Gedling Plan actions is subject to quarterly monitoring to Senior Leadership Team, Cabinet and Overview & Scrutiny Committee. This ensures that senior officers and Members are kept informed.

Progress against the Gedling Plan actions is also published on the Council's website which ensures that the public are able to monitor progress.

Equalities data is also used to inform bids for external funding and used for specific projects such as preparation of Sport and Physical Activity Strategy and the Annual Monitoring Report (planning) and Impact Assessments for policy development.

The template Equality Impact Assessment form requires equality data to be included so that the decision maker has due regard to the public sector equality duty.

The Council intends to take the following action to demonstrate further commitment:

- 1) Consider whether equalities information should be gathered by additional front-line services.
- 2) Data currently gathered does not cover all protected characteristics. Conduct gap analysis and consider whether additional data should be collected.
- 3) Ensure all equalities data is published on the data hub, so that it is readily available and can be taken into account in shaping services and when making decisions.

Effective	Inclusive community engagement structures are being developed
Community	throughout the organisation. There are opportunities for
Engagement	communities to be involved in decision making.

Criteria:

The organisation has an engagement strategy. It is clear about different levels of engagement (i.e. informing, consulting, participating, co-producing) and when these are appropriate.

Engagement structures are in place

There are opportunities for protected groups to be engaged with decision making. The organisation can evidence examples of these opportunities.

Shared engagement structures/mechanisms are in development with partners. There are some shared engagement activities with partners.

The Council already has the following in place to demonstrate commitment:

The Council has in place a Statement of Community Involvement sets out our policies on community consultation and involvement in planning policy documents and planning applications.

Regular consultation are carried out with our communities, including the biennial Residents' Satisfaction Survey, statutory consultations and ad hoc consultations.

Some engagement structures are in place, including the Youth Council and Seniors' Council. The Council has a Community Relations Service with specific responsibility to engage with communities. This engagement is conducted in a number of ways based on a community database; including regular newsletters, Locality coordinators working in particular areas in the borough and a Community development co-ordinator role (commissioned by health partners to work across South Nottinghamshire).

Our customers are able to engage with the Council in a number of ways to ensure maximum accessibility. We interact through a variety of communication channels - face to face, telephone, email, letter, social media and the website.

There are opportunities for protected groups to be engaged with decision making; specifically through the Youth Council, Seniors' Council and Interfaith Forum. The Community Relations Service has actively encouraged broader representation on those groups from the Caribbean Elders and Asian Elders groups.

In response to the Covid-19 pandemic, a partnership with Church Leaders was formed and they were included in decision making regarding food banks and support to the vulnerable.

There are some shared engagement activities with partners in place. These include the Social prescribing project, which is funded by the integrated Care Partnership. The Council is working with the co-production providers to inform social prescribing; specifically developing proposals to inform how health partners engage with the community.

In addition, as part of the LRF response to the Covid-19 pandemic, the County Council developed a hub to support vulnerable individuals which enabled better collaboration with the Council.

The Council intends to take the following action to demonstrate further commitment:

- 1) Consider developing an Engagement Strategy which provides clarity about different levels of engagement (i.e. informing, consulting, participating, coproducing) and when these are appropriate.
- 2) Develop a Community Engagement Toolkit.
- 3) Create and implement a Communications Strategy.
- 4) Consider broadening the scope of the Interfaith Forum to include representatives from other protected groups.
- 5) Identify whether there are any gaps in consultation with protected groups. If so consider whether national organisations which representation those protected groups should be consulted
- 6) Locality co-ordinators work with Locality Steering Groups which predominantly involve partners and stakeholders to inform action plans. Identify whether there are any gaps in representation which need to be filled to better reflect the demographic of the areas.
- 7) Undertake the targeted youth engagement work planned.

Fostering good community relations

Structures are in place within the organisation and across partnerships to understand community relationships and map community tensions.

Criteria:

There are joint partnerships responsible for monitoring community tensions.

The Community Safety Strategy addresses the issue of community cohesiveness

Council leaflets/ posters/ communications/ events promote positive relations.

The Council already has the following in place to demonstrate commitment:

The Council is involved in a number of joint partnerships responsible for monitoring community tensions. The Council is a member of the South Nottinghamshire Community Safety Partnership. Statutory and voluntary partners participate in the SNCSP with a common aim of reducing crime and disorder, anti-social behaviour and promoting healthy and safe communities. The Safer Nottinghamshire Board has a sub group for Hate Crime and membership is drawn from all relevant local statutory and community partnership organisations. In addition there is a countywide Prevent Steering Group with a broad cross section of organisations.

On a practical level Nottinghamshire Police and Public Protection staff are physically located in Jubilee House which enables close working arrangements.

The Policing and Crime Plan (OPCC) and local Community Safety Partnership strategic structures and approaches are in place to identify, monitor and respond to community cohesion issues.

Hate crime and harassment is monitored and analysed by the Hate Crime Steering Group of the Safer Nottinghamshire Board and local borough hate crime issues and concerns are discussed at the Anti-social Behaviour group addressing repeat victimisation in particular. Partnership action is taken at a local level by relevant local delivery partners and actions to address the issues that have been identified. Activity to tackle wider community tension concerns are co-ordinated through the Safer Nottinghamshire Board.

The Portfolio Holder for Public Protection and Portfolio Holder for Community Development are updated on community tensions and activity. All members informally report community intelligence in to the Council and Police.

Council activity and events seek to promote positive relations, in particular recognising the following national days/weeks:

Feb - National Apprenticeship week, World Cancer day, Time to Talk Day March - International Women's Day, Disabled Access Day, National Intergenerational Week and Flag to be flown for International Day against Homophobia, Transphobia and Biphobia

May - Dementia Action Week, National Children's Day, Mental Health Awareness Week

June - Refugee week and flag to be flown for LGBT Pride Month

July - World Youth Skills Day

August - World Breastfeeding week

September - World Suicide Prevention Day, World Alzheimer's day, Disability Awareness Day

October - World Mental Health Day, World Menopause Day

Communications seek to support those with protected characteristics and promote positive relations; such as the Health and Wellbeing E-Newsletter and Leisure E-Newsletter which include signposting to relevant services and promoting public health campaigns.

A number of events are delivered / commissioned for those with protected characteristics and to promote positive relations: such as targeted Youth activities, Play days, International Women's Day event, Intergenerational event and the event to recognise female representation in Gedling. The Arnold Carnival also provides a platform to local charities to fundraise and engage with the community. Arnold Churches together have a service in the park on Sunday morning, a carers roadshow is held and Men in Sheds attend.

The Public Protection (Community Safety) and Community Relations Services within the local authority work alongside partner organisations to engage positively, both proactively and responsively, to build, maintain and develop good relations between diverse communities.

Specific events have been held to forge positive relations between diverse communities, such as the Syrian refugees / Seniors' Council event which was held to foster good relations with Syrian community. An Intergeneration Conference was held in 2019 bringing together the Youth Council and Seniors Council. In addition the Council has facilitated the Police Inspector's attendance at the Caribbean elders' group meeting.

The Council intends to take the following action to demonstrate further commitment:

- Whilst the Council already works with a number of groups representing those in our community with protected characteristics it is recognised that there are gaps. Consideration should be given to identifying and engaging with groups which represent other protected groups (e.g. Gender reassignment, disability).
- 2) Arrange the heritage tour of the borough for representatives from the Seniors Council, Caribbean elders and Syrian refuge community which has been delayed as a consequence of the Covid-19 pandemic. Consulted them on proposals for the heritage way to ensure access for different groups.

Participation in public life

The organisation has a clear understanding of the level of participation in public life by different communities/protected characteristics. This can include involvement in local democracy and representation e.g. school governors, councillors, board members of voluntary/statutory sector organisations.

Criteria:

Information/data is gathered about the extent of involvement in public life

The Council already has the following in place to demonstrate commitment:

The Youth Council, Youth Mayor and Seniors Council are in place and actively supported by the Council to ensure local people, including under- represented groups, are given the opportunity for public participation.

Councillors are appointed to a number of outside bodies (voluntary and community organisations).

- 1) Collect information about the level of participation by different communities/protected characteristics as an elected Member (borough Council) and identify where there is under-representation.
- 2) When conducting public consultation, ensure that organisations representing protected groups are given the opportunity to participate.
- 3) Explore further opportunities to promote the Youth Council and Senior's Council and their activities and achievements.

Leadership The political and executive leadership have publically committed to reducing inequality, fostering good relations and challenging discrimination.

Criteria:

Senior leaders in the organisation have stated their commitment to a diverse workforce and have made clear what is expected from staff when delivering services to the community.

Leadership on equality is demonstrated in a way that is recognised and understood by the organisation and local communities.

Leaders have publicly committed to improving equality in their area.

The organisation has established and publicised a strong business case for its equality work.

The organisation regularly communicates its commitment to promoting equality to staff and the community

There is evidence that publications reflect the organisation's commitment to equality and fostering good relations.

The Council already has the following in place to demonstrate commitment:

The Gedling Plan 2020-23 includes a commitment to improving equality specifically identifying the following priorities and objectives:

Cohesive, Diverse and Safe Communities – To promote strong, resilient communities and reduce hardship and inequality

- Promote and encourage pride, good citizenship and participation
- Reduce poverty and inequality and provide support for the most vulnerable
- Improve social mobility and life chances

Healthy Lifestyles – To promote the health and wellbeing of our residents

• Improve health and wellbeing and reduce health inequalities

The Portfolio Holder for Young People and Equalities has been appointed with lead responsibility for equalities. The Portfolio holder is supported by a Policy Advisor for Young People and Equalities.

The Director of Organisational Development and Democratic Services has been identified as the organisational lead for equality and diversity.

The Code of Conduct for Members which was approved by full Council requires councillors to:

- treat others with respect
- not bully or harass any person
- not to do anything which may cause the Council to breach the Equality Act 2010

Publications reflect the Council's commitment to equality and fostering good relations, by being offered in different formats. The website is also accessible.

A specific paragraph was introduced into the report template from 1 April 2020 to ensure that equality considerations inform decision making. The report template guidance notes include guidance on what should be considered.

The Council intends to take the following action to demonstrate further commitment:

- 1) Introduce a revised Equality and Diversity Policy which includes:
 - A clear commitment from senior leaders to a diverse workforce and clarity on what is expected from staff when delivering services to the community in a way that is recognised and understood by the Council and local communities.
 - A commitment from senior leaders to improving equality in their area.
- 2) Put in place a clear structure, including the creation of a Strategic Equalities & Diversity Group, to demonstrate leadership and organisational commitment, challenge inequalities and drive an improvement agenda.
- 3) Arrange Councillor training on the Policy and equalities obligations.
- 4) Ensure the Council's website complies with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

Priorities and Partnership Working

Partnership working arrangements are being reviewed with the voluntary and community sector and the wider community to ensure that local equality priorities are addressed

Criteria:

Corporate and partnership documents capture the commitment of the organisation and partners to equality.

Equality objectives are reflected in local strategic planning.

The Council already has the following in place to demonstrate commitment:

The Council has a Partnerships register in place.

The Gedling Plan captures the Council's commitment to equality.

The Gedling Health & Wellbeing Partnership (comprising Community Relations, Leisure, Public Protection, Housing strategy, CCG, Notts CC Public health, Jigsaw Homes and a range of other commissioned health services) terms of reference makes it clear that the "ultimate aim is to act efficiently and effectively to improve the health and wellbeing of Gedling residents and to reduce inequalities across the borough". The Partnership has set out its shared objectives and outcomes in the Health and Wellbeing action plan. The Council's commitment to these outcomes is embedded in the Gedling Plan which the inclusion of an action to "Maintain active involvement in the County wide Health and Wellbeing Board, South Nottinghamshire Integrated Care system and continue to support delivery of the Health and Wellbeing Plan".

The Partnership monitors, reviews and evaluates performance against the Plan and this is also reported to Senior Leadership Team as part of the Gedling Plan quarterly performance monitoring.

The Council intends to take the following action to demonstrate further commitment:

 Explore whether there are additional partnership arrangements where shared equality priorities, objectives and outcomes for the borough should be established.

Assessing
Equality
Impact in
Policy and
Decision
Making

Due regard is taken to the aims of the general equality duty when making decisions and when setting policies

Criteria:

The organisation has an agreed approach to conducting equality analysis/impact assessment of policy and service decisions.

Training and support on equality analysis/ impact assessment is available. Impact assessments take account of the views of those affected by the policy or decision.

There is a process for ensuring that equality impact assessments are sufficiently robust.

The Council already has the following in place to demonstrate commitment:

The Council has published an Equality Impact Assessment (EIA) template and guidance on the intranet to ensure there is a standard approach to equality analysis/impact assessment of policy and service decisions. The EIA ensures that consideration is given to the impact of the policy/decision on those in protected groups and what changes could be made to address any negative impacts.

The Customer Insight Officer provides advice and guidance on the completion of the EIA where required.

A specific paragraph was introduced into the report template from 1 April 2020 to ensure that equality considerations inform decision making. Where an Equality Impact Assessment is required, a copy of the completed EIA is appended to the decision report which ensures that the decision-maker can take into account the impact on those in protected groups when making the decision.

An EIA is carried out as part of annual budget setting process to ensure that decisions around budget growth, cuts and savings have taken account of cumulative impact. In addition, a high level EIA is carried out for each service plan which identified the projects/activity which require a more detailed EIA.

The Council intends to take the following action to demonstrate further commitment:

- 1) Review the current EIA template.
- 2) Review the current information and guidance on the intranet to ensure that it is up to date and fit for purpose.
- 3) Publish the revised EIA template and guidance on the intranet.
- 4) Deliver training to all managers on the revised template and guidance so that they understand when an EIA is required and how to conduct a robust and meaningful assessment.
- 5) Publish completed EIAs on the intranet.
- 6) Ensure equality considerations are imbedded into the new project management process.

Equality Objectives and Annual Reporting

Equality objectives for the organisation have been set and published in accordance with the requirements to support the public sector Equality Duty.

Criteria:

The specific duty to publish equality objectives has been met Objectives are underpinned by robust equality analysis. Objectives are SMART(Specific, Measurable Realistic, Achievable and Timely)

The Council already has the following in place to demonstrate commitment:

The identification of equalities objectives is embedded in the Service Plan/Gedling Plan preparation process. These objectives have been identified following a SWOT analysis. The datasets used as part of that SWOT analysis includes equalities information.

Actions identified to deliver those equalities objectives are subject to the same performance management process as other objectives in the Gedling Plan and Service Plans. Progress against the Gedling Plan actions is subject to quarterly monitoring to Senior Leadership Team, Cabinet and Overview & Scrutiny Committee. This ensures that senior officers and Members are kept informed.

Progress against the Gedling Plan actions is also published on the Council's website which ensures that the public are able to monitor progress.

The specific duty to publish equality objectives has been met. They are specifically referenced in the Cabinet report seeking approval for the Gedling Plan 2020-23 and published separately on the Council's website with equalities information.

- 1) Raise awareness of the equality objectives across the Council by ensuring they are published on the intranet.
- 2) Introduce an Annual Equality report to Cabinet, which includes an update on progress of the action plan.

Performance Monitoring and Scrutiny

Appropriate structures are in place to ensure delivery and review of equality objectives.

Criteria:

There is an appropriate and accountable leadership group/ board/ forum who have responsibility for the equality agenda.

There are resources for supporting equality work.

The Council already has the following in place to demonstrate commitment:

The Portfolio Holder for Young People and Equalities has been appointed with lead responsibility for equalities. The Portfolio holder is supported by a Policy Advisor for Young People and Equalities.

The Director of Organisational Development and Democratic Services has been identified as the organisational lead for equality and diversity.

The Gedling Plan is approved by following the process set out in the Budget and Policy Framework. Given the fact that equalities objectives are included in the Gedling Plan, the Overview and Scrutiny Committee is able to scrutinise and challenge the equality analysis/ impact assessment objective setting and monitoring as part of that process.

Actions identified to deliver the equalities objectives are subject to the same performance management process as other objectives in the Gedling Plan and Service Plans. Progress against the Gedling Plan actions is subject to quarterly monitoring to Senior Leadership Team, Cabinet and Overview & Scrutiny Committee. This ensures that senior officers and Members are kept informed.

Progress against the Gedling Plan actions is also published on the Council's website which ensures that the public are able to monitor progress.

- 1) The Council does not have an Equalities Officer or dedicated resource to progress equalities work. Consideration could be given to allocating specific resources for supporting equality work.
- Consider specifically requesting Overview and Scrutiny Committee to scrutinise and challenge equality analysis/ impact assessment objective setting and monitoring.

RESPONSIVE SERVICES AND CUSTOMER CARE

Commissioning and Procuring Services

The organisation ensures that procurement and commissioning processes and practice take account of the diverse needs of clients, and that providers understand the requirements of the public sector Equality Duty.

Criteria:

Guidance is available for suppliers on the equality requirements for the procurement and commissioning process.

There are standard equality clauses for contracts.

The Council already has the following in place to demonstrate commitment:

Procurement instruction forms ask whether specific equality implications need to be considered as part of the procurement process.

The Council includes an equalities questionnaire as part of its invitation to tender package which is assessed as part of the due diligence process when selecting suppliers. Equalities Information is also sought through the Contractor's Questionnaire as part of the tender process.

Standard equality clauses are included in contracts.

The Council has considered how the public pound is spent in regards to local procurement and influence on the local economy. A specific Service Plan Performance Indicator relates to payment of invoices for local businesses within 10 days.

Social value requirements may form part of the evaluation requirements in a tender/quote process but not in respect of every contract.

The Council intends to take the following action to demonstrate further commitment:

- 1) Guidance should be available for suppliers on the equality requirements for the procurement and commissioning process.
- Contract specifications should take account of the different needs of users, for example through equality analysis/ impact assessments.
- 3) Monitoring requirements to be built into contracts to ensure equality issues are addressed.
- 4) Introduce an established Social Value Framework (which could be included in the Procurement Strategy), that includes provision for the Social value of contracts to be measured.

Integration of equality objectives into service planning

Structures are in place to ensure equality outcomes are integrated into business objectives.

Criteria:

Service plans are monitored regularly to ensure that equality objectives are being met.

Equality analysis is fed into planning and assessment of service plans.

Customer care policies highlight the needs of protected groups.

The Council already has the following in place to demonstrate commitment:

Progress against the Gedling Plan/Service Plans is monitored on a quarterly basis to ensure that equality objectives are being met.

A SWOT analysis has been carried out as part of the Service Plan/Gedling Plan preparation process. The datasets used as part of that SWOT analysis includes equalities information. In addition, a high level equality impact assessment is carried out for each service plan which identified the projects/activity which require a more detailed EIA.

Service delivery generally offers equality of access via different methods (face to face, email, telephone, in writing, online, social media). A Visiting Officer in Customer Services ensures home visits are made to our most vulnerable residents to enable them to access much needed funds and resources available to them.

The Complaints, Compliments and Comments Policy recognises the needs of protected groups, enabling communications in different formats.

The approved Customer Promise includes the following commitments: "We Will:

- Treat you in the right way
- Be friendly, helpful and polite
- Treat you fairly and with respect
- Be sensitive to different needs"

The Council intends to take the following action to demonstrate further commitment:

1) Consider whether any additional equalities data and evidence should be collected and considered as part of the service planning process.

Service	The organisation has systems to collect, analyse and measure
Delivery	how satisfied all sections of the community are with services.

Criteria:

There are mechanisms in place for service users to be consulted about service development and delivery

Social Value and Collaborative Principles are reflected in the organisations practical service delivery.

The organisation is able to analyse and measure whether all sections of the community are able to access services.

It is clear who Service users are. Services carry out mapping exercises to identify and review current participation and to highlight gaps.

The organisation collects data about user satisfaction with its services. The mapping and satisfaction data collected is disaggregated by different equality groups or vulnerable communities.

Complaints are disaggregated by protected groups. There are mechanisms in place to enable staff to introduce business improvements.

Appropriate mechanisms are in place to ensure that Human Rights considerations are identified when planning services and that customers and citizens are treated with dignity and respect.

The Council already has the following in place to demonstrate commitment:

There are some examples where service users are consulted about service development and delivery.

A biennial Mystery Shopper exercise is conducted to enable the Council to analyse and measure whether all sections of the community are able to access services.

In relation to accessibility, all four of our leisure centres, the Richard Herrod Centre, The Bonington Cinema and Theatre and Gedling Country Park have been awarded the CredAbility Kite Mark. The Kite Mark denotes that facilities and provisions are in place to suit the needs of our disabled customers and also their carers.

Service User data is collected by Leisure and housing needs with reference to protected characteristics.

Data about access to services and user satisfaction, where collected, is used to support equality analyses/ equality impacts assessment.

The Council's Complaints, Compliments and Comments Policy provides a clear and accessible process for managing customer feedback effectively. At the end of the process Customer Services may contact customers to evaluate our response. The aim of this is to provide information to help the Council determine:

- Whether the complaint procedure was accessible and easy to use.
- Levels of satisfaction with the way the complaint was handled and remedy offered

Each quarter, the Service Manager (Customer Services and Communications) collates details relating to the number of compliments and complaints received by the Council for each Service area. These details will be entered onto the Council's corporate performance management system. SLT receives detailed quarterly reports on complaints and compliments received from customers. An annual complaints report is also presented to Cabinet and Overview and Scrutiny Committee. The report to SLT ensures that customers' experiences are analysed and remedial action is identified and acted upon. Further analysis will be carried out where there is an underlying issue or trend to identify whether additional improvements need to be

made. This focussed attention on complaints data has seen complaints in a number of service areas reduce and customer service improve.

The Council also conducts a biennial Resident's Satisfaction Survey to develop its strategies and understand what residents think and need; and identify any areas where there might be a need for further improvement. The results of the Satisfaction Survey are reported to SLT and Cabinet and used to inform the Gedling Plan. An assessment is also made to understand whether the profile of respondent is proportionate to the profile of the borough. For a number of years the profile of the respondents in terms of ethnicity and gender seems fairly proportionate to the profile of the borough; however the age profile of the respondents is skewed towards the older population. The overall responses in 2019 show that satisfaction with the Council and its services is very positive compared to the results in 2017.

The Council has policies and procedures in place for Community Asset Transfers and Community Right to Challenge to support delivery of services by local communities instead of the local authority.

- 1) Consider further development of mechanisms for service users to be consulted about service development and delivery.
- 2) Explore opportunities for Social Value and Collaborative Principles to be reflected in the practical service delivery.
- 3) Consider whether additional services should collect data to understand who Service users are.
- 4) Ensure that relevant services carry out mapping exercises to identify and review current participation and to highlight gaps.
- 5) Disaggregate complaints, compliments and residents' satisfaction data by different protected groups. Analyse the data to identify and introduce business improvements.
- 6) Review the Equality Impact Assessment form and guidance to ensure that it makes it clear that data about access to services and user satisfaction should be considered.
- 7) Human Rights refresher training should be delivered to Officers and Members to ensure that:
 - human rights issues are understood and considered when delivering services to customers:
 - decision makers have up to date knowledge; and
 - appropriate mechanisms are in place to ensure that human rights considerations are identified when planning services and that customers and citizens are treated with dignity and respect.

	DIVERSE AND ENGAGED WORKFORCE
Workforce Diversity	The organisation understands its local labour market, and has mechanisms in place to monitor its workforce against protected characteristics.

Criteria:

The organisation is clear about its local labour market.

It has begun to identify the steps it needs to take to achieve a diverse workforce. These are reflected in recruitment policies and procedures.

The progress of protected groups through the organisational hierarchy is monitored. Equality mapping data is used as part of the analysis.

Recruitment and selection is monitored at all stages of the process by protected characteristics.

The Council already has the following in place to demonstrate commitment:

As part of the annual Equality Information, workforce data is collected (disability, race, gender, age and religion) within the workforce as a whole and in the top 5%, reported to Senior Leadership Team and published on the Council's website. The data is also analysed to identify where there is underrepresentation when compared to the profile of the borough and whether any specific action is required to redress the balance.

A Performance Indicator reports against visible BME in borough compared to the workforce. This is reported to SLT on an annual basis.

In order to achieve a diverse workforce, targeted recruitment advertisements are sent to direct to community organisations that represent protected groups. In addition, the Gender Pay Gap is reported to SLT and published on an annual basis including narrative of reasons for gap and where necessary, planned actions to narrow the gap.

The Gender Pay Gap and annual equality information is also used to monitor progress of protected groups through the organisational hierarchy.

The workforce profile broadly matches the local labour market/community profile and this is continuously monitored and is reported to SLT annually. There is some under-representation particularly in the senior management of the organisation.

The Gender Pay Gap is very good. There are some "gaps" for other protected characteristics within the workforce but there is a reasonable explanation for the gaps (change is slow due to low turnover of posts).

Recruitment and selection is monitored at all stages of the process for a variety of protected characteristics. This data is included the annual Equality Information reported to SLT and published on the website. Where there is evidence of disproportionality, appropriate action will be taken to reverse the trends.

Recruitment and Selection training is provided to managers which focuses on systematic application of objective assessment against criteria. In addition, the application and shortlisting process have been designed to be "blind" to identification of protected criteria.

Where Members are involved in recruitment to senior posts at Appointments and Conditions of Service Committee, advice and support is provided by the Service Manager: Organisational Development to ensure that the same systematic application of objective assessment against criteria is carried out.

Good use is made of flexible working arrangements and career pathway initiatives to address potential barriers and under representation. Our flexible working policies are exceptional (including flexitime/ consideration of flexible working at point of vacancy authorisation by SLT/ buying of additional leave/ special leave). Training is well supported across the organisation generally with opportunities for succession planning through honoraria arrangements and "acting up" although there are no specific programmes for people with protected characteristics.

The Council intends to take the following action to demonstrate further commitment:

- Explore whether additional data needs to be gathered to ensure the Council is clear about its local labour market
- 2) Develop a new Workforce Strategy, which includes equality as one of its strands and a specific action relating to those protected groups which are not fully represented in the workforce (race and disability to review the community groups targeted to receive job vacancy information with objective being a higher rate of application and selection).
- 3) Ensure that Appointments and Conditions of Service Committee are trained in recruitment and selection (including unconscious bias).

Inclusive
Strategies and
Policies

The organisation's workforce strategies and policies include equality considerations and objectives.

Criteria:

All employment policies and procedures comply with equality legislation and employment codes of practice

The organisation's workforce strategy identifies equality issues.

Targets and objectives are based on internal monitoring, staff consultation and the assessment of the local labour market and barriers to employment.

New/changing employment policies and procedures are assessed for their impact on people with protected characteristics.

All employment and training related policies are regularly reviewed. The council is using its workforce data to develop training and development strategies that can support a wider equalities agenda for employees.

The Council already has the following in place to demonstrate commitment:

The Council's employment policies and procedures comply with equality legislation and employment codes of practice.

Performance indicators are in place to cover a range of metrics that focus both on employees with protected characteristics in the general workforce and also in respect to the top 5% of the workforce (in terms of pay). The PIs have targets set against them and are reported to SLT on an annual basis. As a Disability Confident employer, measures are also in place to try to overcome barriers to employment including a "guaranteed interview scheme".

Equality information is collected by Organisational Development relating to recruitment and the workforce and reported to Senior Leadership Team. When necessary, changes will be made as a result of equality analysis findings. The current performance indicators show that the workforce is not fully representative of people with protected characteristics of race and disability.

There are many policies that are designed to support employees with protected characteristics (Attendance Management Policy/ Flexible and Agile Working Policy/ Flexitime Policy/ Menopause in the Workplace Policy) and a number of measures of support were agreed in 2020 to comply with the GMB Charter against domestic abuse. Some polices have a review built in after introduction e.g. Menopause in the Workplace and Flexible Working policies which includes consultation with Unions and management as appropriate to determine if they are fit for purpose.

The Council has an extensive set of policies and practices to enhance workforce equality and diversity including equal pay, flexible working and family friendly policies: including Adoption Policy; Equal Opportunity Policy; Equal Pay Policy Statement; Flexible and Agile Working Policy; Flexible Retirement Policy; Menopause in the Workplace Policy; flexitime; flexible working; job evaluation; and special leave.

The employment policies are included in the Employee Handbook which is readily accessible to Managers and employees or through Organisational Development. The "Managers' page" of the Intranet also sets out key policies for managers to reference. To ensure consistent application of policy some employee relations training has been delivered to managers and this will be developed to be delivered in a more structured and regular way to all managers. All managers responsible for recruitment have been trained in Recruitment & Selection.

New policies are promoted to staff in a number of ways, such as poster campaigns which have been used to promote some policies (such as the Time Out Policy that allows staff to buy additional time to spend away from work) and news stories on the intranet (for policy changes e.g. Menopause in the Workplace Policy).

Due to capacity issues within Organisational Development not all employment and training related policies are regularly reviewed. However, the range of policies

continues to be developed; workforce policy development is dynamic with periodic review for example the Flexible and Agile Working Policy reviewed in 2019.

In order to support a wider equalities agenda for employees, training is delivered through an equalities workbook to all employees which must be completed at the commencement of their employment and through recruitment and selection training to managers. Training is based on legislation and best practice.

A range of inclusive structures are in place to engage and involve staff; including the Our Gedling Group (employee engagement group), annual Employee Awards, Employee Conference, support and recognition of trade unions, Suggestion Scheme and an Employee survey (biennial).

In relation to participation and engagement, the 2019 employee survey showed the highest rate of employee satisfaction with high rates of questionnaire return. There is active participation in the Our Gedling and Employee Awards by all teams across the Council.

The Council intends to take the following action to demonstrate further commitment:

- 1) Complete the review of the Equality Policy (Employment) which is currently underway and ensure it includes a reasonable adjustments policy (employment).
- 2) Develop a new Workforce Strategy, which includes equality as one of its strands and a specific action relating to those protected groups which are not fully represented in the workforce (race and disability to review the community groups targeted to receive job vacancy information with objective being a higher rate of application and selection).
- 3) Once approved, put in place measures to implement and monitor the equality aspects of the workforce strategy.
- 4) Ensure that an EIA is carried out when introducing new/amending employment policies and procedures to ensure they are assessed for their impact on people with protected characteristics.
- 5) Put in places processes to ensure all employment and training related policies are regularly reviewed.
- 6) Proactively use workforce data to develop training and development strategies that can support a wider equalities agenda for employees.
- 7) Further develop employee relations training for managers developed so that it is delivered in a more structured and regular way to all managers.

Collecting,
Analysing and
Publishing
Workforce Data

Systems are in place to collect and analyse employment data across a range of practices (recruitment, training, leavers, grievance and disciplinaries etc).

Criteria:

The organisation reports annually on its Gender Pay Gap.

People are encouraged to provide data and there are initiatives in place to increase the disclosure of equality information by staff.

Diversity monitoring information is separated from recruitment decisions and held securely.

GDPR processes are in place and regulations are being met.

The Council already has the following in place to demonstrate commitment:

The Council reports annually on its Gender Pay Gap. The data is reported to Senior Leadership Team, Portfolio Holder for Young People and Equalities and Joint Consultative and Safety Committee and uploaded to the relevant government website. The data is assessed by Senior Leadership Team to determine whether any actions are required to achieve a gender-neutral state in terms of mean pay differential.

The Council also prepares and publishes an annual Pay Policy Statement.

Diversity monitoring information is gathered as part of the recruitment process but is separated from recruitment decisions and held securely. An in-house on-line system has been developed so ensure that these good practices are applied consistently.

Processes are in place to ensure compliance with the GDPR and Data Protection Act 2018 and training has been provided to staff. A recent exercise was undertaken in 2019 to encourage all employees to update their personal information within the self-serve HR system (ResourceLink) including personal data relating to equalities/protected characteristics.

Workforce data is collected, reported to Senior Leadership Team and published on the Council's website. The data is also analysed to identify where there is underrepresentation when compared to the profile of the borough and whether any specific action is required to redress the balance.

At the point of recruitment, data is transferred from the application system into the HR system and so that data that is collected through the recruitment exercise properly informs the HR system. This system ensures that full data is effectively and systematically collected.

The Council is a 'Disability Confident' employer.

The Council intends to take the following action to demonstrate further commitment:

- 1) Continue to encourage employees to provide relevant data and introduce initiatives to increase the disclosure of equality information by employees.
- 2) Continue to review activity to maintain the Disability Confident employer standard.

Learning and DevelopmentThe organisation carries out regular assessments of the training and learning and development needs required to ensure its

councillors and officers are equipped to understand their equality duties and take action to deliver equality outcomes.

Criteria:

An assessment has been made as to what equality-related training, learning or development is required

Appropriate behavioural competencies have been identified for the workforce. The learning and development plan/strategy take account of equality issues. Induction training for new Members includes equality and all Members are offered Equality training.

Appraisal processes ensure staff and managers are aware of their equality-related responsibilities and accountabilities

The Council already has the following in place to demonstrate commitment:

All employees (including decision-makers) are required to complete the Equalities Workbook when their employment commenced and are therefore exposed to equalities and diversity training.

There is evidence that equality issues are mainstreamed into all training (e.g. training on customer care), for example within the management and leadership training that is delivered. The Code of Conduct training for Members also covers a requirement to comply with the Equalities Act.

Different methods are used to promote learning and development to a wide audience, including workbook, workshops, standard courses, webinars and coaching.

Appropriate behavioural competencies have been identified for the workforce through the Gedling Employee, Gedling Manager and Gedling Leader Standards. These standards are used to: assess individual performance; assess personal development needs; recruit great employees into our business; move unsuitable people out of our organisation; and through all of the above, to improve the organisation's performance.

The use of these standards through the Performance and Development Review (PDR) processes ensures staff and managers are aware of their equality-related responsibilities and accountabilities. In particular, "Caring and considerate" (vulnerable people) is a core value in the Gedling Employee and all employees are assessed against this.

- 1) Introduce regular equality and diversity refresher training for all employees, which includes 'unconscious bias'.
- 2) Explore delivery of equality training through on-line material that would be accessible to all employees.
- 3) Re-commission the training drama group to deliver equalities-based training which was due to be delivered at the Employee Conference 2020.

- 4) When planning learning and development for employees ensure that equality issues are taken account of.
- 5) Introduce equality training for all Members.
- 6) Ensure that induction training for new Members following the next borough elections includes equality training.

Wellbeing key employee health and wellbeing issues
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Criteria:

The organisation uses workforce data and other information from staff to determine what its health and wellbeing priorities are

The organisation has assessed all aspects of the working environment to ensure that the needs of all its employees are met

A range of inclusive mechanisms are in place to engage and involve staff Policies and systems are in place to identify, prevent and deal effectively with harassment and bullying at work.

The organisation has a policy for Reasonable Adjustments for staff and Members and managers are trained to implement it.

Occupational health services are provided

The organisation has started to address mental health issues in the workplace

The Council already has the following in place to demonstrate commitment:

The Council collects employee absence data and reports it to Joint Consultative and Safety Committee on an annual basis. This data is used to determine what the health and wellbeing priorities should be. A "fast track" physiotherapy service has been introduced after the data showed that muscular-skeletal problems resulted in high levels of absence. Mental health (stress and anxiety) is also recognised as an issue that results in substantial absence and as a consequence the Council has:

- Launched the Employee Assistance Programme scheme;
- Commissioned team member/ manager training sessions; and
- Committed to acquisition of on-line mental health awareness support package

Risk assessments, through which all aspects of the working environment have been assessed to ensure that the needs of all its employees are met, are in place. In addition personal and private risk assessments have been carried out in relation to employees who have particular needs (e.g. as a result if disability, pregnancy or race). All employees also take part in annual PDR process which is an opportunity for individual needs to be raised and addressed.

The Suggestion Scheme, Our Gedling Group, Employee survey, Employee Conference and Employee Awards are in place to engage and involve staff.

An Anti-harassment policy, Disciplinary Procedure and Grievance Procedure are in place to identify, prevent and deal effectively with harassment and bullying at work. The Employee Assistance Programme is in place to provide support to staff. The Code of Conduct for Members also includes an obligation not to bully or harass any person.

The consideration of reasonable adjustments are dealt with within the Attendance Management Policy and guidance can be obtained from Occupational health. Reasonable Adjustments are provided in a timely fashion across the Council. Cases are managed within policy and consistently with support from Organisational Development. For issues of mental health time limits are specified in the Absence Management Policy for referral to Occupational Health. Employees are also encouraged to make an application to Access to Work where they require help at work which is not covered by the obligation to make reasonable adjustments.

Occupational health services are provided by an external provider and referral to occupation health is a normal part of welfare case management.

The Council has started to address mental health issues in the workplace, with the introduction of the Employee Assistance Programme, acquisition of an awareness package and commissioning training for team members and managers in the Attendance Management Policy. It is recognised that not all managers may be personally confident to deal with mental health issues of staff in their team and so support is provided through our Organisational Development who are experienced and confident practitioners able to support managers (and individual employees).

Harassment and bullying incidents are monitored and analysed regularly as part of the monitoring of disciplinary and grievance cases. These are reported to SLT annually in terms of race and gender as part of the annual equalities information and published on the Council's website.

Allegations would always be investigated and appropriate action taken to address the issues that have been identified through existing policy.

Through its training and employee policies the Council has adopted the social model of disability. The council focus is on "ability" not "disability" and the approach seeks to remove barriers in order to enable employment.

- 1) Complete the review of the Equality Policy (Employment) which is currently underway and ensure it includes a reasonable adjustments policy (employment).
- 2) Provide training so that managers understand how to implement reasonable adjustments.
- 3) Further develop the close relationship with occupational health to identify and address absence trends.
- 4) Deliver the team member and manager training for support of mental health in the workplace which has been delayed due to the covid pandemic (planned 2021).