

## **Report to Cabinet**

**Subject:** Equality, Diversity and Inclusion Policy

**Date:** 28 March 2024

**Author:** Interim Corporate Director

### **Wards Affected**

All Wards

### **Purpose**

To seek approval of the Council's Equality, Diversity and Inclusion Policy 2024-27 and to update Member's on the responses to consultation on the policy and future work plans in respect of equality and diversity.

### **Key Decision**

This is a key decision as the policy and workplan are likely to have a significant impact on residents or businesses across the borough.

### **Recommendation**

#### **THAT Members:**

- 1) Approve the Equality, Diversity and Inclusion Policy 2024-27
- 2) Note the consultation responses and future workplan in relation to equality and diversity.

## **1 Background**

1.1 In October 2021, Cabinet approved the Council's Equality and Diversity Policy document along with the Equality and Diversity Framework and Action Plan for 2021-2024. These documents were approved following two rounds of public consultation.

1.2 In January 2024, Cabinet agreed to launch a consultation on proposed changes to the Equality and Diversity Policy for 2024-27. The consultation was launched mid - February and closed on 17<sup>th</sup> March 2024.

### 1.3 **Summary of feedback from public consultation**

#### Background and Methodology

The proposed policy sets out the Council's commitment to provide its services to the public fairly and to promote equality and diversity.

The Council consulted local people and community groups on what impact its proposed Equalities and Diversity Policy has on people in Gedling, what changes they would suggest to the policy, what equality and diversity aspects are most significant to them, and what their experience is relating to equality, diversity and inclusion with the Council's services.

#### 1.4 Response to the consultation

Views on the proposed policy were sought by conducting an online consultation and questionnaire that ran between February and March 2024. The consultation was both open to response from the public through general consultation channels and also from community groups to which consultation questionnaires were sent directly. Paper copies were also made available to customers at our outreach hubs. There were 39 formal responses to this consultation. Consultation was also undertaken face to face with the Youth Council and the Council's Overview and Scrutiny Committee and a summary of responses from those groups is detailed below. In addition one customer emailed directly their views on the policy with proposed amendments.

#### 1.5 Main findings from online/paper responses

Despite widespread coverage through a range of media channels the official response rate was quite disappointing. Of the respondents commenting about the proposed Equality and Diversity Policy;

-36% agreed that the proposed policy will have a positive impact on the lives of the people of Gedling.

- 41% disagree that the policy will have a positive impact on the lives of people of Gedling.

- 23% of the respondents remained neutral.

There were several comments ranging in content and relevance. The report summarises some of the themes of the consultation but full responses can be found at appendix 3. Part of the response has been redacted as it contained information which would potentially identify the responder. This section was also essentially a complaint about a non-Council facility so was no relevant to this consultation.

## 1.6 Results analysis

To summarise responses in a meaningful way, the responses to this consultation have been categorised within the **S** (Strengths), **W** (Weakness), **O** (Opportunities) and **T** (Threats) matrix. By using the residents' views within this matrix, the Council can establish the following:

- Strengths and Weaknesses analysis that allow a clear distinction between the views on what aspects of the policy are considered to be positive and what aspects would need further improvements.
- Opportunities and Threats analysis that allow the council to consider suggestions on how to continue and shape work in this area and also raises awareness of the risk associated with this work, which can be identified in advance and therefore avoided.

## 1.7 Strengths

The positive replies to consultation confirm that there are respondents who are satisfied with Council services in relation to equality, diversity and inclusion. Some of their responses include comments such as, 'mostly good experience,' 'no issues or concerns,' 'my dealings with the council have been favourable'. Leisure services were specifically mentioned as 'extremely inclusive and work hard to include all.'

## 1.8 Weaknesses

The respondents who were less satisfied with the proposed Equality and Diversity Policy described the policy as 'vague' suggesting that it does not 'explicitly promote equality in all its aspects.' Some have criticised the consultation itself and methodology, some do not see any benefit in the policy at all and consider it a waste of money. Certainly in terms of consultation approach this is something that will be included as an action

## 1.9 Opportunities

Some of the respondents suggested changes to the proposed policy.

The suggestions mainly relate to the theme that policy should be presented in a more 'committal way' by outlining specific needs to each protected characteristic, real commitments to eliminate unlawful discrimination and using the term 'inclusion' in its title.

Also suggested was that the council should evaluate its published documents in respect of their accessibility, if they are visually easy to read, comprehensible etc.

The examples of some comments are:

- 'Reference to each protected characteristic and their needs'
- 'Commitment to eliminate unlawful discrimination across the borough'
- 'Information about making all aspects of life in Gedling more representative, e.g. the workforce.'
- 'Publish more photos of people who are older in age.'
- 'Consider changing the name of the policy and Equity and Inclusion, in line with many other organisations nationally. Diversity per se does not improve the outcomes of those who experience discrimination.'
- 'Consider accessibility of how documents are written, typeface, colours (dyslexia and sight appropriate) plain English language etc.'

#### 1.10 Threats

Some comments relating to this policy expressed concerns that the policy, without a firm set of actions, might represent only 'a tick box exercise' and that it might become only a PR exercise.

'Ageism' appears as a frequently used work in the respondents' comments representing a threat that this type of discrimination might be potentially overlooked.

Examples of some relevant comments include:

- 'Publish more photos of people who are older in age.'
- 'Aspects relating to age discrimination, which is as yet not taken as seriously as other forms of discrimination e.g. sexism, racism.'

#### 1.11 Consultation with Youth Council

The policy was presented to the Youth Council for consideration as part of the Youth Council meeting held on 19<sup>th</sup> February 2024. Their views on the policy and the Council's approach to equality and diversity more generally was discussed. The youth Council's comments are summarised below:

- More focus is needed on accessibility to parks and play equipment
- Council needs to demonstrate what they are actually delivering in terms of equality and diversity which the policy doesn't necessarily do
- Regard needs to be had for non-visible disabilities

- As part of the procurement of play equipment regard needs to be had to wheelchair users
- There should be more seating available in our parks for those who struggle to walk long distances
- Equality and Diversity training should be delivered in the Council and in schools in a way that makes it meaningful and by people who have lived experience
- Our roads and pavements are difficult for wheelchair users

### 1.12 Consultation with Scrutiny Working Group

Overview and Scrutiny Committee agreed to establish a working group to be part of the consultation on the Equality and Diversity Policy. The group met on 27<sup>th</sup> March 2024. A summary of the feedback and discussion are as follows:

- It is recognised a policy is needed and broadly it is fit for purpose
- The policy should include a definition of diversity
- There should be more in the employment section about overcoming barriers to employment and promotion and encouraging diversity in recruitment
- Need to consider our consultation approach more widely going forward to improve engagement thinking about language
- There should be union representation on the staff inclusion group
- The consultation has attracted negative online commentary in some areas with a general comment that the Council is not inclusive
- Paper copies of the consultation should be more readily available in the customer hubs and Leisure Centres
- The approach to embedding equality actions in service plans was supported
- All protected characteristics should be included in survey responses where equality data is captured
- Promote positive impacts of equality and diversity
- Need to look at recruitment and job advertisements to ensure inclusivity

### 1.13 **Proposed actions and revisions to draft policy arising from consultation**

Although perhaps small in number, the responses to the consultation are extremely valuable and actions are proposed arising from this consultation. It is recognised that the policy is designed to be a high-level document and that to include specific detail about specific protected characteristics may not be appropriate in the document itself. That said, it is clear that there is a significant proportion of respondents that feel that more clarity to relate actions to specific characteristics is needed and this is addressed in the

proposals below.

It is proposed to:

- Formally amend the policy title to Equality, Diversity and Inclusion Policy
- To continue to take account of accessibility of documents made available to the public on our web pages, particularly as a consideration in the event of any changes to web page design or a change to web software.
- In the quarterly performance reports to Cabinet, for any action that is referenced that has a relevance either directly or indirectly to matters of equality diversity and inclusion, the specific protected characteristic or characteristics that might be relevant to that action will be identified. This will serve to provide clarity of how the action will improve or affect specific protected characteristics.
- Include a definition of diversity within the policy
- Include additional wording under the employee section to reflect recommendations from Scrutiny Committee
- Include additional wording in our providing services section to demonstrate that we will investigate promptly complaints of discrimination, harassment, victimisation and bullying.

These responses to the consultation are designed to be positive and practical in nature and aim to address the main issues of concern. Some of the points raised in consultation will form part of service plan actions as detailed later in the report. In relation to accessibility to parks and play equipment, our Parks and Street Care team do carry out consultation on park design and ensure disability standards are met, more detailed Equality Impact Assessments will be completed as part of this process to reflect the outcomes of consultations.

#### 1.14 Equality Actions 2024/25

Under the current Equality and Diversity Framework and Action Plan, the Council has an action plan which includes 70 actions created against the Local Government Association Equality Framework for Local Government. This has been a significant piece of work and is largely completed. The new approach proposed in the policy from 2024 is to embed equality actions into

annual service plans rather than having stand alone equality plans. An assessment against the LGA framework has identified areas where we need to fill gaps to improve our approach to equality and diversity and these are referenced in service plan actions for 2024/25.

- 1.15 Annually, the council undertakes a service planning exercise. Each service area produces a service plan containing specific actions that are designed to meet the objectives and high-level themes that are set out in our business plan, the Gedling Plan. Currently this plan runs from 2023 to 2027.
- 1.16 As part of this Plan the Council also seeks to fulfil its obligations under the public sector equality duty which came in to force in April 2011 (s.149 of the Equality Act 2010). Under this Act the council is required to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010 to:
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 1.17 To ensure transparency, and to assist in the performance of this duty, the Equality Act 2010 (Specific Duties) Regulations 2011 require public authorities to publish equality objectives, at least every four years.
- 1.18 Within the four-year Gedling Plan 2023-27, the summary statement encapsulating the theme of “Community”, is for the Council “to enable a resilient, empowered, connected, inclusive and healthy community”. More specifically, within that theme is the stated objective to, “Provide opportunities for all people to connect and live, work and socialise together, and have equal access to services”.
- 1.19 In order to satisfy this objective and to practically and meaningfully contribute to the delivery of the requirements of the Equality Act, the following key service-based actions are currently proposed for inclusion in planned future reports to Cabinet:
  - Promote and encourage participation with apprenticeship opportunities for residents across the Borough
  - Coordinate a manageable number of work experience placements (school age and working age placements)

- Support and coordinate the ongoing “compact” (statement of mutual support) arrangement with Nottingham Trent University
- Through community and voluntary sector partner engagement and activities, enable and maximise targeted resources to those most vulnerable in Gedling and wider residents as appropriate.
- Deliver the Gedling Employability Programme to schools across the borough.
- Work with Family Support Hubs through engagement with Notts County Council’s Children and Families’ Service.
- Enable the Gedling Youth Council to scrutinise, advice upon and champion services to young people.
- Work with the Notts County Council’s Young People’s Mental Health Strategic Group and Youth Service to develop and improve access for local young people to mental health support.
- Implement a series of actions to digitally upskill customers of the Council.
- Drive forward service interventions identified in the Leisure Strategy, including greater integration with health and wellbeing partners to address health inequality.
- Work with VCS, Health Services and others represented on the Health and Wellbeing Board Co-production Group to create optimum growth in services for, and in communities and extend the reach of Health and Wellbeing services and support promotion. This includes delivery of health inequalities work in targeted localities.
- Through the Strength in the Community programme, offer a grant fund for local community hubs, parishes and grass roots providers.
- Seek to improve our domestic abuse response through the introduction and adoption of an established set of standards and an accreditation process (Domestic Abuse Housing Alliance (DAHA) accreditation). Also, the implementation of the Violence against Women Strategy.
- Create and implement Housing Strategy to include consideration of the needs of vulnerable groups including those with physical/learning disabilities and older people who may need adaptations to remain in their accommodation.



- Designate a Resettlement Officer to work directly with refugees and asylum seekers
- Establish a programme of customer engagement to support transformation through the production of a corporate consultation strategy.
- Provide training and support to key managers to improve complaint responses and particularly those in relation to equality complaints to ensure that practical support can be offered where appropriate.
- Review funding strategy for external funding bids and grants to ensure equality impacts are understood when determining bid applications.
- Delivery of recruitment and selection training (ongoing programme) to avoid bias.
- Assess under-representation in the workforce and produce an improvement action plan.
- Improve access to mental health support for employees both through the promotion of the Employee Assistance Programme and also through the introduction of Mental Health First Aiders
- Review the delivery of the annual health fair for staff and in particular to undertake a scoping exercise to explore the factoring in of wider staff healthcare needs.
- Review our offer to Care Leavers

1.20 In order to ensure that these actions are progressed, a separate action is also included in service plans which is to implement and monitor the delivery of the actions relating to equality, diversity and inclusion over the year. Report will be made on a quarterly basis to the Strategic Equality and Diversity Group that is chaired by the Portfolio Holder for Life Chances and Vulnerability.

1.21 Other minor actions relating to equality, diversity and inclusion are also included in service plans at a departmental level and would not be reported to committee other than in summary form.

## **2 Proposal**

- 2.1 It is proposed that Cabinet approve the Equality, Diversity and Inclusion Policy at Appendix 1 to this report. The changes from the current policy, including those made as a result of consultation feedback are shown in tracked changes.
- 2.2 It is proposed that Cabinet note the consultation responses and the actions taken to address these responses within the policy document and future service plans.

### **3 Alternative Options**

- 3.1 Cabinet could determine not to approve the policy for 2024-27 or agree a different policy. It is however recommended that the Council have an outward facing equality related policy to demonstrate our commitment to our public sector equality duty. This policy has been prepared following consultation with our community.

### **4 Financial Implications**

- 4.1 In terms of the financial implications, there are no direct financial implications arising from this report.
- 4.2 As indicated, there is no dedicated resource associated with the equality agenda and the work and associated budgets form part of approved budgets within service areas.

### **5 Legal Implications**

- 5.1 The Council has a statutory duty to comply with the requirements of the Equality Act 2010. The policy, and action plan demonstrates how the Council seeks to comply with its Public Sector Equality Duty and deliver on its Equality objectives as set out in the Gedling Plan.

### **6 Equalities Implications**

- 6.1 An Equality Impact Assessment in relation to this policy is attached at appendix 2, individual service actions will have their own equality assessment.

### **7 Carbon Reduction/Sustainability Implications**

- 7.1 There are no carbon reduction/sustainability implications arising directly from this report. Any individual actions which would give rise to such impacts would be assessed separately.

## **8 Appendices**

- 8.1 Appendix 1 – Equality, Diversity and Inclusion Policy 2024-27

Appendix 2 – Equality Impact Assessment

Appendix 3 – full consultation responses redacted section containing personal information in a complaint about a non-Council facility.

## **9 Background Papers**

- 9.1 [Equality Framework for Local Government \(EFLG\) 2021 | Local Government Association](#)

## **10 Reasons for Recommendations**

- 10.1 To ensure the Council has an ongoing Equality Diversity and Inclusion Policy and action plan that is fit for purpose.

### **Statutory Officer approval**

**Approved by:**

**Date:**

**On behalf of the Chief Financial Officer**

**Approved by:**

**Date:**

**On behalf of the Monitoring Officer**