

# **GEDLING BOROUGH COUNCIL**

## **INTERNAL AUDIT REPORT**

**EQUALITY, DIVERSITY AND INCLUSION (EDI) MATURITY ASSESSMENT  
MARCH 2025**

IDEAS | PEOPLE | TRUST

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## DISTRIBUTION

Francesca Whyley	Deputy Chief Executive Officer
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BDO LLP APPRECIATES THE TIME PROVIDED BY ALL THE INDIVIDUALS INVOLVED IN THIS REVIEW AND WOULD LIKE TO THANK THEM FOR THEIR ASSISTANCE AND COOPERATION.

## REPORT STATUS

<b>Auditors:</b>	Gurpreet Dulay, Partner Paul Akanbi, Assistant Manager
<b>Dates work performed:</b>	29 July - 4 October 2024
<b>Draft report issued:</b>	4 December 2024
<b>Final report issued:</b>	4 March 2025

# EXECUTIVE SUMMARY

## CRR REFERENCE: 4 - FAILURE TO RECRUIT AND RETAIN STAFF AND MAINTAINING INTERNAL CAPACITY



### SCOPE

#### BACKGROUND

- ▶ The Public Sector Equality Duty (PSED, or “the duty”), which applies in Great Britain (England, Scotland and Wales), requires public authorities to have due regard to certain equality considerations when exercising their functions, like making decisions.
- ▶ It requires public authorities to have due regard to the need to:
  - Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Equality Act
  - Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it
  - Foster good relations between people who share a relevant protected characteristic and those who do not share it.
- ▶ Additionally, an organisation’s approach to equality, diversity, and inclusion is indicative of its culture, which is intrinsically linked to its development and performance. It is also integral to service planning to ensure that the Council is able to demonstrate its commitment to integrating equality, diversity, and inclusion into its service delivery.
- ▶ Gedling Borough Council (‘the Council’) has proactively contacted the Local Government Association (LGA) to request a peer review in this area and has conducted a self-assessment on the Equality Framework for Local Government (EFLG) which concluded ‘Achieving’ status (the categories being ‘Developing, Achieving or Excellent’).
- ▶ The Council recognises that it has a legal obligation to ensure that its practices through service provision and its employees do not discriminate against any person(s) and is committed to promoting equality and equity of opportunity for all its employees.
- ▶ The Council is committed to providing services and employment opportunities that are inclusive across all protected characteristics- Age, Disability, Gender Reassignment, Marriage & Civil Partnership, Pregnancy & Maternity / Ethnicity, Religion or Belief, Gender / Sex and Sexual Orientation - in accordance with the Equality Act 2010 and its public sector duties.
- ▶ The Council is focused on reviewing its approach to EDI, recognising that it is on a journey, and is re-evaluating its EDI arrangements as a result to help support the embedding of EDI initiatives in future. For example, the Council recently decentralised EDI action plans into annual Service plans effective April 2024 for a day-to-day assessment of actions against objectives.

#### PURPOSE

The purpose of the BDO Equality, Diversity and Inclusion Maturity Assessment is to help ensure an effective approach to Equality, Diversity and Inclusion becomes embedded across the Council by highlighting areas where processes could be improved.

As primarily an advisory piece of work assessing the Council’s current position against the BDO Equality, Diversity and Inclusion Matrix, this assessment will not generate an assurance opinion.

**AREAS REVIEWED**

We considered the maturity of the Council's current EDI arrangements by assessment against BDO's EDI maturity model.

The following elements were assessed:

Tone from the Top	<ul style="list-style-type: none"> <li>• Mission, Vision, Values and Strategy</li> <li>• The Board and Senior Management</li> <li>• Roles and Responsibilities</li> <li>• EDI Risk Management</li> </ul>
Governance, Compliance and Strategy	<ul style="list-style-type: none"> <li>• EDI Strategy</li> <li>• Operational Planning</li> <li>• Compliance</li> <li>• Pay Gap Analysis</li> <li>• Third parties</li> </ul>
Structure	<ul style="list-style-type: none"> <li>• Committees, Networks and Forums</li> <li>• Resources</li> </ul>
Policies, Procedures, Training and Development	<ul style="list-style-type: none"> <li>• Policies and Procedures</li> <li>• Training and Development</li> </ul>
Measurement, Accountability and Continuous Improvement	<ul style="list-style-type: none"> <li>• Measurement</li> <li>• Accountability</li> <li>• Continuous Improvement</li> </ul>

The current and target levels of maturity for each area were assessed in accordance with five categories, defined in Appendix I:

Immature	Aware	Defined	Mature	Continuous Improvement
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The EDI Maturity Assessment Matrix is at Appendix I and sets out the definitions for each level of maturity. It is the intention that the results of the assessment assist those charged with governance in the further development of an effective and embedded EDI framework.

We have summarised below the current and target maturity levels, based on our work performed and a realistic trajectory of progress for the Council.

	Tone from the Top	Governance, Compliance and Strategy	Structure	Policies and Procedures	Continuous Improvement
Current	Mature	Aware	Defined	Aware	Defined
Target	Continuous Improvement	Defined	Mature	Defined	Mature

We have summarised below the number of recommendations we have raised for each element.

Scope Area	Maturity	Significance of Recommended Actions			Total Recommended Actions
		Low	Medium	High	
Tone from the Top	Mature	4	2	0	6
Governance, Compliance and Strategy	Aware	7	3	0	10
Structure	Defined	1	3	0	4
Policies, Procedures, Training and Development	Aware	3	3	0	6
Measurement, Accountability and Continuous Improvement	Defined	0	0	0	0
Total of Recommended Actions		15	11	0	



## AREAS OF STRENGTH

We identified the following areas of good practice:

### Tone from the Top

- ▶ The Council's Equality Diversity and Inclusion Policy 2024-2027 demonstrates a comprehensive understanding of EDI principles, clearly articulating its EDI vision in alignment with the Local Government Association Equality Framework, showing commitment to best practices in the sector.
- ▶ The Council has embedded EDI into its core values, particularly under 'Continuous Improvement and Inclusivity'. This is reflected in the Gedling Plan 2023-27, which explicitly links EDI to the 'Community Priority' of enabling a resilient, empowered, connected, inclusive and healthy community.
- ▶ There is clear Senior leadership commitment, such as the Portfolio Holder for Young People and Equalities chairing the Strategic Equality and Diversity Group (SEDG), showing that EDI is a priority at the highest levels of the organisation. This group's broad membership, including the Leader of the Council and Chief Executive, with the Deputy Chief Executive Officer identified as the senior responsible officer for EDI, further reinforces this commitment.

### Governance, Compliance, and Strategy:

- ▶ The Council has developed a Comprehensive Framework and Action Plan. Its Equality and Diversity Framework and Action Plan for 2024/25 is based on the Local Government Association Equality Framework, demonstrating alignment with sector standards. The plan is structured around four key areas (Understanding Communities, Leadership & Organisational Commitment, Responsive Services, and Diverse Workforce) providing a holistic approach to EDI.
- ▶ The Council has applied the EFLG to assess and improve its EDI practices, leading to the completion of 62 out of 70 equality actions in the 2023/24 financial year, showing a strong commitment to continuous improvement.
- ▶ The Council has a structured approach to embedding EDI considerations in change programmes, services, and policy changes through Equality Impact Assessments (EIAs). This allows the Council to identify and demonstrate compliance with applicable legal and regulatory standards, such as the Public Sector Equality Duty.
- ▶ The Council has conducted multiple rounds of public consultations on its EDI policies, and other actions, most recently between February-March 2024, where feedback was analysed and implemented towards developing its EDI Policy for 2024-27, demonstrating a commitment to community engagement and responsiveness to public feedback.
- ▶ The Council's use of the EFLG for self-assessment shows a commitment to benchmarking against established standards and continual improvement.

#### Structure:

- ▶ The Council has established multiple committees and groups dedicated to EDI, including the
  - Strategic Equality and Diversity Group (SEDG). With its broad membership including executive and political leadership, it provides a strong governance structure for EDI initiatives,
  - Officer Equality and Diversity Group, which supports and ensures EDI is embedded at an operational level, complementing the strategic focus of the SEDG
  - and Gedling Inclusion Group Support (GIGS) which is a staff-based network demonstrating a commitment to grassroots engagement with EDI issues.

Some of the groups have clear terms of reference and reporting lines, ensuring EDI issues can be escalated effectively.

#### Policies, Procedures, Training and Development

- ▶ EDI-related policies are subject to regular review and update, as evidenced by the recent update to the Equality and Diversity Policy for 2024-2027 also there is a comprehensive policy framework supporting EDI, including policies on whistleblowing, conduct, and grievances.
- ▶ There is inclusion of EDI considerations in procurement processes demonstrating a commitment to extending EDI principles to the Council's external relationships. contract documentation and procurement processes.

#### Measurement, Accountability, and Continuous Improvement

- ▶ The Council has implemented strong data collection systems, including the Data Hub and regular satisfaction surveys, and reviewed the Equality and Diversity Monitoring Form to ensure consistency of data collection providing a solid foundation for EDI-related decision-making.
- ▶ As of April 2024, EDI Action plans have been integrated into service plans and the Gedling Plan with performance against targets being monitored

quarterly by the SEDG and reported to Cabinet, to ensure EDI considerations are part of core operational planning.

- ▶ The Council provides regular reports on EDI progress to Cabinet and the Overview and Scrutiny Committee, demonstrating accountability and transparency.



## AREAS FOR IMPROVEMENT

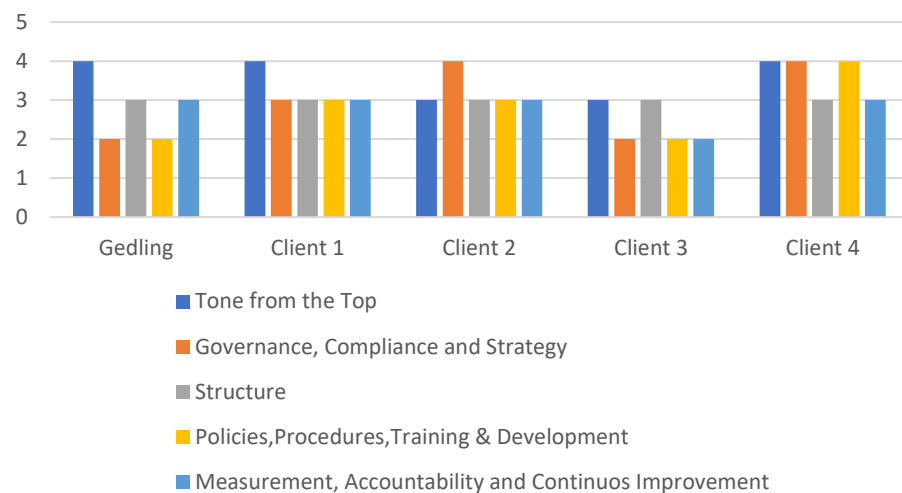
### We found:

- ▶ While the Council has a risk management framework, the Corporate Risk Register does not explicitly include EDI-related risks, potentially leading to inadequate risk management in this area (Finding 1 - Medium).
- ▶ There is a lack of specific, measurable outcomes or outputs for some of the EDI actions in the Council's action plan, making it difficult to assess the true impact of initiatives (Finding 2 - Medium).
- ▶ The Council's gender pay gap analysis lacks detailed root cause analysis and does not propose specific action plans to address the existing gap or prevent it from widening. Furthermore, while the Council collects various forms of equality data, there is limited evidence of cross-referencing this data (e.g., gender pay gap data with other protected characteristics e.g. race, disability) to identify intersectional trends (Finding 3 - Medium).
- ▶ Staff network leads for the Gedling Inclusion Group Support (GIGS) lack dedicated protected time for their roles, which may limit the effectiveness and impact of the group (Finding 4 - Medium).
- ▶ EDI training is mandatory at the Council and undertaken through the Meritec eLearning platform, completion rates are however low at 50.2% for the period covering April 2023 to March 2024. This is particularly concerning for frontline staff who do not have access to the EDI computer-based training. Furthermore, specific-role based trainings on Equality are not provided for line managers with responsibility for implement and embedding equality objectives (Finding 5 - Medium).



## ADDED VALUE

- ▶ As part of our review of staff networks and strategic EDI groups at the Council, we have identified an opportunity to provide additional value by developing sample templates and examples to support the Council's EDI governance framework.
- ▶ We have developed the following templates based on best practice observed across our public sector client base:
  - Staff Network Terms of reference template
  - EDI Strategic Group Terms of Reference
- ▶ The templates and examples are provided in Appendix III and IV and can be adapted by the Council to meet specific local needs while maintaining core governance principles.
- ▶ Having conducted a number of these EDI assessments at other clients we have compared the Council's score against key indicators of the assessment against other public sector organisations. This can be evidenced by the graph below:



## CONCLUSION

- ▶ The Council has demonstrated a clear commitment to embedding Equality, Diversity, and Inclusion (EDI) principles across its operations and community engagement. The Council's new approach to embedding EDI actions into annual service plans, along with the establishment of the Gedling Inclusion Group Support (GIGS), demonstrates a forward-thinking approach.
- ▶ The Council has made significant strides in several key areas:
  - Strategic Commitment: The Council has developed a comprehensive Equality Diversity and Inclusion Policy for 2024-2027, aligning with the Local Government Equality Framework.
  - Leadership and Governance: The establishment of the Strategic Equality and Diversity Group (SEDG), chaired by the Portfolio Holder for Young



People and Equalities, shows clear leadership engagement with EDI issues at the highest levels of the organisation.

- Community Engagement: Regular public consultations on EDI policies and frameworks indicate a strong commitment to community input and transparency.

However, there are areas where the Council can further enhance its EDI maturity:

- ▶ While the Council has taken steps to embed EDI into service plans, there is room for further integration of EDI considerations into risk management processes and performance metrics.
- ▶ The Council should continue to assess whether current resource allocation for EDI functions is sufficient to meet its ambitious goals.
- ▶ There is an opportunity to enhance EDI training, particularly for managers, to ensure consistent application of EDI principles across all levels of the organisation and develop effective strategy to ensure staff without access to computer are provided with regular EDI trainings.
- ▶ While the Council has mechanisms in place for reporting on EDI progress, there is scope for developing more specific, measurable EDI-related Key Performance Indicators (KPIs) and enhancing systems for tracking and analysing EDI-related trends over time.

The Council has established a solid foundation for EDI work and shows a clear commitment to continuous improvement in this area. These initiatives have the potential to significantly enhance the Council's EDI performance if effectively implemented and monitored.

# AREAS FOR IMPROVEMENT

## 1 TONE FROM THE TOP

Significance



Medium



### EDI RISK MANAGEMENT

The Council's risk management framework has a risk appetite statement defining its current overall base risk as moderate, implying the Council remains open to innovative ways of working and to pursue options that offer potentially substantial rewards, but carry a moderate level of risk.

We noted there is not a clear indication the Council is aware of how this may affect its EDI approach. There is no reference to EDI in the Corporate Risk Register or its sub actions to indicate this is being monitored. Risks associated with EDI are therefore not identified, recorded, reported and applicable controls have not been put in place to mitigate them.

Our interview with the Deputy Chief Executive confirmed the Council has recently had a new risk management framework agreed by Cabinet and a new corporate risk register is in draft, with planned workshops for managers for awareness and better understanding of the framework. They state the new risk register while not having EDI headline risks, has new actions in it to address equality and diversity activities.

Equality, Diversity, and Inclusion (EDI) are essential for fostering a workplace where all employees feel valued, heard and respected. Poor EDI practices can result in low employee morale, higher turnover rates, difficulty in attracting and retaining top talent and in worst case scenarios, lawsuits against employers.



### RECOMMENDATION

- A. The SEDG to conduct a review to identify relevant potential EDI risks and agree on the best method of documenting, addressing and monitoring these risks. Any risks or actions identified that are relevant to any risks in the Corporate Risk Register should be identified and the CRR updated as necessary. This would enable the Council to promote a diverse and inclusive environment by ensuring that EDI risks are identified, assessed, and managed alongside other strategic risks.

We raise the below as best practice, appreciating that this is a complex area requiring significant time and resource and therefore the Council should decide how it can implement this recommendation in its current position.

- B. Ideally the risk identification process would involve engaging with managers and EDI groups within the council to obtain a 360 understanding of the risks that may affect different demographic groups.
- C. Each identified EDI risk should be described in sufficient detail, clearly stating what the risk is, and where possible identifying the root cause or factors contributing to the risk and the potential impact on the Council. This should then be regularly (either monthly or quarterly) reported on in alignment with Council's new risk management framework.



### MANAGEMENT RESPONSE

The Council's current Risk framework was adopted following a recommended strategy from BDO that was considered a good standard. The Corporate Risks did not specifically identify

EDI as a risk category on its own. The SEDG group do identify EDI risks although this is not specifically labelled as such, this is done through complaint monitoring and performance monitoring by SEDG. The Council will set up a separate risk register for EDI which can be linked to Corporate Risks and reflected through Corporate Risk management. The Council is shortly to establish a Corporate Risk Group SEDG can feed any escalation risks into that group.

<b>Responsible Officer:</b>	Deputy Chief Executive
<b>Implementation Date:</b>	July 2025

## 2 GOVERNANCE, COMPLIANCE AND STRATEGY

Significance



Medium



### SMART ACTION PLANS

There are 16 equality actions stated in the Gedling Plan 2024-25 with actions spread across each of the 12 services to be embedded within the annual service plans, providing a good understanding of what needs to be done, with target completion dates provided for each action to track progress. While services like Development and Place has three equality actions, Governance and Customer Services had 11 as applicable. Each action item has an assigned accountable lead, with 'Notes' included for actions which provides additional context or updates on the action's status.

While the Equality Actions within the Gedling Plan demonstrate a comprehensive approach to EDI with actions being generally clear in their intent, ie EQU01 'Undertake Data analysis of hate crimes' and EQU03 'Deliver Health inequalities work in targeted localities in Carlton, Netherfield etc,' many lack specific, measurable outcomes or outputs. For example:

- EQU02: "Drive forward service interventions identified in the Strategy, including greater integration with health and wellbeing partners to address health inequality". This does not specify what constitutes success or how progress will be quantified.
- EQU07: "Enable a more co-ordinated assessment of data sources in planning and decision making". The action appears unclear without specific methods, measurable outcomes or defined deliverables.
- EQU06: "Provide training and support across services to improve complaint responses in relation to equality related complaints". While the intent is clear, it lacks specifics on the type of training, measurable improvement targets or define deliverables and doesn't define how these gaps will be measured or what constitutes a "gap".

Without SMART outcomes and clearly defined deliverables, objectively assessing progress and success of EDI initiatives may be difficult, potentially resulting in inconsistent interpretation of action requirements across services.



### RECOMMENDATION

- A. Council to review all actions to ensure they have specific, measurable outcomes or outputs, where possible, add quantifiable targets and clearly define deliverables for each action.
- B. Revise each action to include specific, measurable outcomes e.g EQU03 can read 'Reduce health inequality gap in Carlton and Netherfield by X%' to then be measured by a specific metric.
- C. Define clear deliverables for each action clearly stating the tangible outputs expected. For example, EQU01 'Produce a comprehensive data analysis report on hate crimes including trend analysis and recommended interventions, by Q3 2024'.



### MANAGEMENT RESPONSE

As part of service planning for 25/26 the Council is adopting a new approach and focusing on an annual delivery plan. Actions and KPIs will be clearly identified and SMART. These will be monitored through the Budget and Performance Group and specific EDI actions through SEDG. EDI actions will be reviewed as part of service planning for 25/26.

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Responsible Officer:	Deputy chief Executive
Implementation Date:	March 2025

### 3 GOVERNANCE, COMPLIANCE AND STRATEGY

Significance



Medium



#### PAY GAP ANALYSIS

The Council reports annually on its Gender Pay Gap and as of August 2024 presented the data to Senior Leadership Team to determine whether any actions are required to achieve a gender-neutral state in terms of mean pay differential. The report was submitted to the Portfolio Holder for Young People and Equalities and Joint Consultative and Safety Committee. We confirmed the Gender Pay Gap data has been uploaded onto the Council website for 2024 and published on the relevant government website. The Council has also prepared and published its annual Pay Policy Statement for 2024.

We reviewed the Council Gender Pay Gap report and noted that while the report provides useful data and context on the gender pay gap and recognises that the lower quartile has a disproportionate number of female employees, the report does not provide detailed breakdowns that could help identify root causes and does not propose specific action plan to address the existing gap or prevent it from widening.

While we recognise the Council has plans to participate in the planned government intention to produce Ethnicity Pay Gap data, there is presently no cross referencing of gender pay gap with any other forms of data at the Council. It is recognised that there may be scope for further analysis of how gender interacts with other factors to influence pay and career progression.

Also we noted the Council has not formally conducted analysis on pay gaps related to other protected characteristics, such as disability to provide valuable insights into the organisation's equality landscape. If ethnicity and other protected characteristics pay gap analyses are not performed there is a potential risk that the Council does not identify discrimination within the organisation, which may have a negative effect on employee wellbeing and potentially result in legal disputes.



#### RECOMMENDATION

- A. The Deputy CEO should delegate a member of staff to conduct a detailed analysis of pay structures and career progression given the high proportion of women in the lower quartile.
- B. The SEDG should:
  - Set realistic ambitions such as increasing the proportion of men in the lower quartile or women in the upper quartile by a specific percentage within a defined timeframe.
  - Analyse the data collected on its equality information to understand how different characteristics combine to affect pay.
  - We appreciate the Council may have limited resources to perform this complex work, and we simply state the below as recommendations the Council could take if it had resources to as best practice:
  - Ideally, the analysis should also cover inter-sectionality and how factors like age, ethnicity and working patterns correlate with gender in different pay quartiles and explore whether certain age groups face compounded disadvantages in pay and progression. The Council could also conduct a review to assess the relevance and feasibility of analysing pay gaps related to other protected characteristics to inform and enhance the council's broader equality, diversity and inclusion strategies and action plans. This can involve comparing the mean pay gap between races or

ethnicity on an hourly rate basis, examining/analysing the difference in average bonus pay.



#### MANAGEMENT RESPONSE

As identified, the Council does not necessarily have capacity or specific resource to undertake this work, however, this recommendation will be referred to the Assistant Director for Workforce to see what if any action could be taken. Certainly, as author of the Pay Gap Report the recommendations will be useful to her.

**Responsible Officer:**

Jennifer Lovett

**Implementation Date:**

July 2025



## 4 STRUCTURE

Significance



Medium



### COMMITTEES, NETWORKS AND FORUMS

The Council has established the Strategic Equalities and Diversity Group (SEDG) to provide corporate leadership, ensure commitment in meeting the Council's Public Sector Equality Duty under the Equality Act 2010, and to ensure it demonstrates fairness in its delivery of services and in its employment practices and the Officer Equality and Diversity Group which is a support subgroup convened by the SEDG to ensure performance management of equality actions against framework and action plan, ensuring deliverability on an operational level.

The Council also has a staff-based equality network, the Gedling Inclusion Group Support (GIGS) established as a proactive forum to drive positive change in equality, diversity, and inclusion across the Council.

We reviewed the terms of references for the groups and noted the following.

- The SEDG terms of reference outlines the need to set and monitor an annual workplan, like the Equality Framework and Action Plans.
- The Officer Equality Group, Terms of Reference is not standardised, as the aim/purpose of the group, frequency of meeting, members, as well as reporting or escalation path was not stated.
- GIGS has a draft term of reference, stating the purpose and remit of the group, frequency of meeting, roles and responsibilities, and list of members. However, there is no defined escalation path or reporting line within the guide to show how information is fed back to management.
- The GIGS, SEDG as well the Officer Equality groups allocate actions to members at every meeting although a log is not maintained for follow up.
- The Council has not formally agreed upon documented protected time for leaders of staff network groups to undertake group activities,

If the governance and structure of the EDI groups, and the escalation process, are not clearly defined, there is a potential risk that they become ineffective in responding the issues they were set up to address.



### RECOMMENDATION

- A. The Chair of the Officer Equality Group should develop formal terms of reference for the Officer Equality Group as part of its governance structure and make clear the distinction between representative and executive forums. The group should be made up of appropriate senior leaders across services to ensure that EDI can be embedded in operational areas.
- B. Terms of reference for GIGS to be completed by the Chair of GIGS and reviewed and approved by the Deputy CEO /SEDG for consistency of language, updated to include clear escalation and feedback pathway. (We have provided a sample of best practice ToR template as seen in other public sector organisations we have worked with. Members of the group should be allocated protected time to attend and carry out actions, and the Deputy CEO should ensure that line managers are aware of and supportive of this, incorporating it into workload planning and performance discussions.
- C. Action logs arising from networks and groups should detail specific, measurable, achievable, realistic, and time-bound (SMART) actions, assigned to appropriate leads.

**MANAGEMENT RESPONSE**

The Equality Officer Group will be merging into budget and performance which has its own terms of reference.

The GIGs terms of reference will be reviewed by Deputy Chief Executive, however it should be noted that the idea of GIGs is that they were independent from leadership and set up by staff for staff to determine their own terms. Allocation of protected time can be considered and communicated to relevant managers.

Actions will be more effectively captured from all meetings as part of our Making Meetings Matter programme.

<b>Responsible Officer:</b>	Deputy Chief Executive
<b>Implementation Date:</b>	July 2025

## 5 POLICIES, PROCEDURES, TRAINING AND DEVELOPMENT

Significance



Medium



### TRAINING AND DEVELOPMENT

Equality Diversity and Inclusion is a mandatory training at the Council, which underscores the commitment of the Council in this area, as in many organisations this training is not mandatory. Training is carried out via an e-learning module provided by Meritec. All starters at the Council are required to complete this as part of their onboarding requirement with a refresher every 3 years. The training is available on the Council intranet page for easy accessibility and refresher purposes. In compliance with the Council EDI policy, the provision of training for Members and officers in relation to equality and diversity awareness are provided at the Council. Trainings were also provided to officers in relation to the consideration of human rights impacts in report writing and decision making.

Training compliance figures for the period covering April 2023 to March 2024 showed at the time of audit testing that 216/430 (50.2%) of staff had completed this training.

We also noted the Council mandatory training advises staff to discuss with their line managers if they suspect a case of discrimination or have concerns about the operation of the EDI policy in their work area, however there were no role-specific training offerings to support managers if this was to occur. Furthermore, a desire for additional training for managers was identified in GIGS meeting minutes as a factor contributing to instances of unacceptable behaviour experienced by some staff, as managers do not feel confident to address this.

Training at the Council is administered through Meritec, an eLearning platform, including the EDI training, despite approximately half of the population of Council staff not having access to computers to complete such training, due to the nature of their jobs ie frontline staff with varying shift patterns like those in Leisure services, and Depot staff from the Parks teams, Waste services etc. This contributed to low completion rates of training.

Absence of manager-specific training could limit managers' ability to effectively support their diverse workforce and create an inclusive environment where staff feel safe and comfortable to raise concerns. This could result in a lack of confidence in handling sensitive situations, recognising microaggressions or addressing unacceptable behaviours, potentially leading to underreporting of issues and decreased staff morale.



### RECOMMENDATION

- A. The Deputy CEO should send out a reminder to all staff to complete the EDI training. In addition to developing alternative training formats (ie face-to-face sessions, workshop activities) and allocation of budget and protected time for non-office-based staff to complete EDI trainings, the Council should consider implementing a mobile-friendly learning option for staff to support those without access to PCs but potentially to smartphones. The Deputy CEO could also consider including and providing EDI training during team meetings or briefing.
- B. To further enhance this, additional manager-specific training could be provided to equip these staff with the requisite knowledge on inclusive leadership skills, how to support staff as well as handle difficult conversations around unconscious bias and managing microaggressions. Managers training should also include how to embed EDI considerations through service plans and business cases through the equality impact assessment toolkit.
- C. The Council could consider developing role-specific EDI content relevant to different service areas and regularly assess training effectiveness of EDI training across different delivery methods.

**MANAGEMENT RESPONSE**

In terms of A - a reminder for training will be sent out. Alternative options for non-PC users are already in place with a training officer deployed at the depot to deliver corporate training including EDI training this arrangement has been reviewed and specific training for frontline staff working within the depot will be provided in 2025/26 through an external provider.

In terms of management training this is accepted and a suitable course will be identified. (Sept 25)

SEDG identifies training needs on an ongoing basis.

<b>Responsible Officer:</b>	Deputy Chief Executive
<b>Implementation Date:</b>	Sept 25

## ASSESSMENT OF EDI MATURITY AGAINST THE BDO EDI MATURITY MODEL

EDI Maturity Assessment - Tone from the Top			
1.	Mission, Vision, Values, and Strategy	✓/✗	Evaluation
1.1	The organisation has clearly outlined its Vision, Values, and Mission.	✓	<b>Vision</b>
			The Council has defined its vision as: 'Serving People, Improving Lives'
			<b>Values</b>
			In preparation for its new plan for 2023 - 2027, the Council ran a consultation during August and September 2022, with feedback from the consultation themed around the underlisted areas, addressed by the Gedling 4-year Plan values that depicts what the Council stands for and how it does its business. <ul style="list-style-type: none"> <li>• Openness and trust</li> <li>• Communication and Empowerment</li> <li>• Fairness and respect</li> <li>• Continuous Improvement and Inclusivity.</li> </ul> The Council has further drafted an Equality framework around four priority areas of, Understanding and Working with Communities, Leadership, Partnership and Organisational Commitment, Diverse and Engaged Workforce and Responsive Services and Customer Care with clear actions on how this will be achieved with clear timescales of between 1 April 2024 and 31 March 2025 to achieve this by.
1.2	Values are clearly integrated into key organisational documents, e.g. strategy documents and operational plans.	✓	<b>Mission</b>
			The Council also has a defined ambition: 'To be regarded as an excellent council by the people and businesses we serve and the staff we employ, by making a positive difference to people's lives and creating opportunities for everyone to achieve their full potential'.
1.2	Values are clearly integrated into key organisational documents, e.g. strategy documents and operational plans.	✓	<b>Strategic Objectives</b>
			The Council has defined four key strategic objectives in its four-year Gedling Plan. These are: <ul style="list-style-type: none"> <li>• To encourage and support healthy businesses in our town and local centres, improving local skills and employment opportunities, and promoting an economy that attracts visitors throughout the day and supports leisure activity</li> <li>• To enable a resilient, empowered, connected, inclusive and healthy community.</li> <li>• To enable a safe, attractive, clean and culturally vibrant borough that plays its part to tackle the climate emergency.</li> </ul>

			<ul style="list-style-type: none"> <li>To ensure the council is a healthy place to work, it engages with its customers, has a focus on improvement, is financially sound, and ensures compliance with all relevant legislation.</li> </ul>
			<b>Linking to Annual operational objectives</b>
			<p>Within the Gedling Plan 2023-27, which is a strategic document that sets out key objectives for the Council for the next four years, it has outlined 16 operational Equality Actions to be achieved within each year, with defined responsible officers/action owners, progress bar to measure rate of completion quarterly during the year, targeted date of completion, this is to ensure alignment of day-to-day operations to Council strategic objectives. For example:</p> <ul style="list-style-type: none"> <li>Ensure recruitment and Selection Training includes training to avoid bias</li> <li>Provide training and support across services to improve complaint responses in relation to equality related complaints</li> <li>Drive forward service interventions identified in the Strategy, including greater integration with health and wellbeing partners to address health inequality</li> </ul> <p>These actions have been included within the service plans with actions allocated to each service area, progress monitored and recorded on Pentana management system</p>
1.3	There is a formal process to ensure EDI is embedded into the organisation's strategy, values and key objectives.	✓	<b>Embedding inclusion in values</b> <p>As noted in Tone from the Top 1.1, one of the core Council values is 'Inclusive'.</p>
			<b>Embedding inclusion in the strategy</b>
			See 1.2 above
<b>2. The Cabinet and Corporate Management Team</b>			
2.1	There is an identified Diversity and Inclusion lead at Board and/or Executive level.	✓	<b>Executive Lead</b> <p>The Director of Corporate Resources (and recently appointed Deputy Chief Executive) has lead responsibility for equality and diversity within the Council and the Chief Executive is responsible for encouraging continued proper regard for equal opportunities issues at a strategic level within the Council.</p>
2.2	Values and EDI are discussed and documented at Executive and Cabinet level.	✓	<b>Values Development</b> <p>See Values in 1.1 above</p>
			<b>Cabinet Meetings</b>

			<p>We reviewed Cabinet meeting minutes for October 2023, January 2024, March 2024 and August 2024. We also reviewed the Deputy CEO's report provided to the Overview and Scrutiny Committee in January 2024.</p> <p>We noted:</p> <ul style="list-style-type: none"> <li>• The presentation of update on Equality and Diversity Framework and Action Plan with most actions in progress and monitoring of completion being undertaken by the Strategic Equality and Diversity group (SEDG). Establishment of the Officer Equality Group in October 2023 was mentioned, to support the SEDG. Other equality matters like inclusion of care leavers as a protected characteristics within the Council and defining this within the Equality Policy, were highlighted through the SEDG.</li> <li>• January 2024 Equality and Diversity Policy, Framework and Action Plan report revealed 62 of the 70 Actions Plans have been completed and confirmed by the SEDG, supported by the Officer's Equality Group and group of staff volunteers. Review of the current Equality and Diversity Policy, which expired in March 2024 has been completed and a new approach derived from the Local Government Association Equality Framework for Local Government, has been adopted. This is proposed to undergo public consultation following approval from Cabinet.</li> <li>• The Deputy CEO reported to the Overview and Scrutiny Committee on the establishment of a working group to consider proposed changes to the Council's Equality and Diversity Policy for 2024-27.</li> <li>• 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. 36% of respondents agreed the proposed policy will positively impact the people, while 41% believed it will not and 21% were neutral. Following from this, Council has proposed a new approach from 2024 to embed equality actions into annual rather than having them as standalone equality plans.</li> </ul>
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			<b>Corporate Management Meeting</b>
			At the August 2024 Corporate Management Team (CMT) meeting, the Director of Transformation reported, Council has conducted a Gender Pay Gap analysis of its employees and reported same to Management, with overall report showing the mean gender pay gap remains well within the parameters that might be expected for similar public sector organisations. Request the approval and upload of data and statement from the analysis to appropriate government website and include this into the year's Pay Policy Statement and upload same to the Council website.
2.3	The Cabinet has reviewed its own diversity and have formally considered whether there is a need for a Cabinet Diversity Action Plan.	✓/x	<b>Building a safe space at Cabinet/ CMT level</b>
			There was an Equality Diversity performance indicator report produced annually at the Council that goes to Corporate Management Team (CMT), these reports monitor numbers of staff with disability, their ethnicity etc within the top 5% of the workforce/organisation. This has however not been reported on in recent times as services now have EDI actions embedded within service plans,  Council to commence the KPI monitoring report and consider measuring and reporting on the percentage difference between individuals identifying as disabled on the CMT and or Cabinet and compare this to its organisation's overall workforce. To assess whether there is need for a senior management diversity action plan to ensure fair representation.
2.4	The board have mandated that a formal approach be taken to EDI and sets out why EDI is important.	✓	As noted above in 'Tone from the Top' 2.1, this is supported by identifying the Chief Executive and the Director for Corporate Resources as senior responsible owners for EDI at the Council
2.5			<b>Executive Succession Planning</b>

	There is a structured approach to consider EDI in Cabinet and Executive management recruitment and succession planning.	✓/x	<p>The Council actively recognises talent through the payment of honoraria and identifies training and development needs for staff through annual Performance and Development Reviews (PDR). The Council's Workforce strategy also outlines proposed developments in this area with each service area required to identify key posts and put plans in place to ensure that there is credible succession planning, and for this departmental succession planning documents to then be updated annually.</p> <p>There is also a 'How to be a Councillor' pack to encourage any and everybody interested in this, as well as the Youth Council which encourages younger demographics between the ages of 11-19 living and or schooling in the Borough. The Gedling Youth Council serves for a three-year term, meets every quarter and have been ongoing since 2019 with the Council electing its first Youth Mayor in June 2019.</p> <p>While we recognise Council's initiative towards this, and the proposal to establish succession planning practices within service plans between April 2024 and September 2024. As at the time of our review, there is no formal structure or approach to identify key jobs and to consider EDI in Cabinet and Executive management succession planning, as these initiatives have not been implemented.</p> <p>REC</p> <p>Council should develop and implement an EDI framework for Corporate Management Team recruitment and succession planning that includes:</p> <p>Review and revise senior recruitment process to eliminate potential bias and consider implementing diverse shortlisting requirements This could include screening job posts for biased language and amending with more inclusive language</p> <p>Develop a formal succession planning that considers diversity</p> <p>Regularly review and monitor diversity metrics within senior leadership.</p>
<b>3. Roles and Responsibilities</b>			
3.1	Roles and responsibilities are clearly defined and articulated.	✓	<p>There is a clear structure in place within the Council's Equality Diversity and Inclusion Policy 2024-27, to demonstrate its leadership and organisational commitment, challenge inequalities and drive an improvement agenda. Several individuals and groups were identified as having specific roles in meeting Council equality and diversity responsibilities. Councillors, Cabinet and Council Leaders, Portfolio Holder for Life Chances and Vulnerability, Senior Leadership Team, Heads of Service, and Senior Managers, all have clearly defined responsibilities to ensure they demonstrate commitment to equality and diversity in their work, decision making, and strive to improve equality in their various capacities.</p>

			While the Chief Executive is responsible for encouraging continued proper regard for equal opportunities issues at a strategic level within the Council, and the Director with Lead responsibility required to monitor and report on its performance, The Policy stated all employees have a personal responsibility to ensure that the Council's commitment to equality and diversity is fulfilled.
4.	<b>EDI Risk Management</b>		
4.1	The organisation is aware of how its risk appetite may affect its approach to EDI.	×	<p><b>Risk Appetite Statement</b></p> <p>While the Council's risk management framework has a risk appetite statement defining its current overall base risk as moderate, implying the Council remains open to innovative ways of working and to pursue options that offer potentially substantial rewards, but that carries a moderate level of risk, there is not clear indication the Council is aware of how this may affect its EDI approach as no reference was made to EDI in the Corporate Risk Register or its sub actions to indicate this is being monitored.</p> <p>The Council has recently (March 2024) had a new risk management framework agreed by Cabinet and a new corporate risk register in draft, with planned workshops for managers for awareness and better understanding of this. The new risk register while not having EDI headline risks, has new actions in it to address equality and diversity activities</p> <p>REC</p> <p>The council to include EDI considerations in its draft corporate risk register or create specific sub-actions outlining steps to mitigate identified EDI risks and promote a diverse and inclusive environment to ensure that EDI risks are identified, assessed, and managed alongside other strategic risks.</p> <p>Council to conduct a review to identify all potential EDI risks, engage with managers and EDI groups within the council to ensure a comprehensive understanding of the risks that may affect different groups within the organisation.</p> <p>Ensure that each identified EDI risk is described in sufficient detail, clearly stating what the risk is, identifying the root cause or factors contributing to the risk and the potential impact on the Council</p> <p>Establish a regular reporting schedule for the risks, either monthly or quarterly, depending on the organisation's needs.</p> <p>Council to develop specific mitigation strategies, outlining actions within the plans in services to reduce the likelihood of the risk occurring and minimise its impact if it does.</p>

4.2	Risks relating to EDI are identified and appropriately scored in line with the organisation's methodology. Risks are described in sufficient detail to understand what the actual risk is, the cause of the risk and potential impact to the organisation.	*	We noted on the Council's CRR that there is not a defined risk addressing inequalities All though the new Council EDI approach has a long-term plan of embedding EDI risks within the everyday operations of the Council, and EDI risk is planned to be monitored and measured through the Workforce risk departmental register and the Equality Action log for this year.
4.3	Risks relating to EDI are appropriately reported in line with the organisation's risk appetite and risk reporting methodology.	*	See 4.1 above
4.4	Controls have been put in place to address the root cause of the risk. Where there are inadequate or insufficient controls, an action plan has been identified with appropriate timescales and an identified lead.	*	See 4.1 above

Tone from the Top					
	Immature	Aware	Defined	Mature	Continuous Improvement
Current				✓	
Target					✓

Recommendations for improvement - TONE FROM THE TOP	
<ol style="list-style-type: none"> <li>1. Since the Council previously monitored protected characteristics within the top 5% of the workforce/organisation, it should consider resuming and enhancing this report to measure the percentage difference between individuals identifying as disabled on the CMT and or Cabinet and compare this to its organisation's overall workforce, to assess whether there is need for a senior management diversity action plan to ensure fair representation.</li> <li>2. The Council to include EDI considerations in its draft corporate risk register or create specific sub-actions outlining steps to mitigate identified EDI risks and promote a diverse and inclusive environment to ensure that EDI risks are identified, assessed, and managed alongside other strategic risks.</li> <li>3. The Council to conduct a review to identify all potential EDI risks, engage with managers and EDI groups within the Council to ensure a comprehensive understanding of the risks that may affect different groups within the organisation.</li> <li>4. Ensure that each identified EDI risk is described in sufficient detail, clearly stating what the risk is, identifying the root cause or factors contributing to the risk and the potential impact on the Council</li> <li>5. Establish a regular reporting schedule for the risks, either monthly or quarterly, in alignment with Council's new risk management framework.</li> <li>6. The Council to develop specific mitigation strategies, outlining actions within the plans in services to reduce the likelihood of the risk occurring and minimise its impact if it does.</li> <li>7. The Council should develop and implement an EDI framework for Corporate Management Team recruitment and succession planning</li> <li>8. Review and revise senior recruitment process to eliminate potential bias and consider implementing diverse shortlisting requirements</li> <li>9. Develop a formal succession planning that considers diversity as well as regularly review and monitor diversity metrics within senior leadership.</li> </ol>	

EDI Maturity Assessment - Governance, Compliance, and Strategy			
1.	EDI Strategy	✓/✗	Evaluation
1.1	The organisation has outlined its vision for what an effective EDI framework would look like in context of its mission, values, and key strategic objectives.	✓	<p>The Council has developed a draft 2024/25 Equality Framework and Action Plan for each year, which is assessed against the Local Government Association Equality Framework for Local Authorities. The actions will form part of Service Plans and linked to the Gedling Plan objectives to further embed equality and diversity into the delivery of Council functions. The Framework has set out the following four modules for improvement supported by actions and sub actions to ensure achievement of objectives:</p> <ul style="list-style-type: none"> <li>• Understanding and Working with Communities</li> <li>• Leadership, Partnership and Organisational Commitment</li> <li>• Responsive Services and Customer Care</li> <li>• Diverse and Engaged Workforce</li> </ul> <p>This is linked clearly to the Council's vision and values, specifically to its priority on Community, to enable a resilient, empowered, connected, inclusive and healthy community. The Council's approach aims beyond compliance, recognising that organisational practices have an impact on its culture, hence the need to embed Equality initiatives into Service Plans for a day-to-day assessment of actions against objectives.</p>
1.2	A documented and appropriately authorised EDI strategy is in place which outlines activity that will be undertaken to achieve the organisation's vision for an effective EDI framework.	-	As at the time of our review, the Deputy CEO has presented their report to Cabinet at its March 2024 meeting seeking approval of the Council's Equality, Diversity and Inclusion Policy 2024-27, the Equality Framework and Action Plans as well as update Member's on future work plans in respect of equality and diversity.
1.3	The organisation's EDI strategy recognises that the EDI framework should be embedded across all areas of the organisation.	✓	<p><b>Four key areas</b></p> <p>The Council's Equality Framework and Action Plans 2024/27 proposes to cover four key areas:</p> <ul style="list-style-type: none"> <li>• <b>Understanding and Working with Communities</b> - Gathering and publishing information and data on the profile of its communities and the extent of inequalities and disadvantage, with plans to collect, share and use equality information with partners</li> <li>• <b>Leadership, Partnership and Organisational Commitment</b> - Political and executive leadership have publicly committed to reducing inequality, fostering good relations and challenging discrimination</li> <li>• <b>Responsive Services and Customer Care</b> - The Council ensures that procurement and commissioning processes and practice take account of the diverse needs of client, and that</li> </ul>

			<p>providers understand the requirements of the public sector Equality Duty</p> <ul style="list-style-type: none"> <li>• <b>Diverse and Engaged Workforce</b> - The Council understands its local labour market, and has mechanisms in place to monitor its working against protected characteristics</li> </ul> <p>The Framework and Action Plan will include actions each year and will form part of Service Plans and link to the Gedling Plan objectives to further embed equality and diversity into the delivery of Council day-to-day functions.</p>
1.4	The EDI strategy is evidence-based, and the organisation has selected and carried out appropriate and relevant methodologies to inform its approach. ✖	✓	<p>The Council's Equality framework and Action Plans have been assessed against the Local Government Association Equality Framework for Local Government ("LGA framework"). This approach provides a framework against which local authorities can self-assess their overall status in relation to equality and diversity against three categories: developing, achieving and excellent. The Council has self-assessed itself as 'developing' against the EFLG following completion of most of its actions for 2021/24. For 2024/27, the Council has developed a framework and action plans for each financial year which will form part of Service Plans and link to its strategic objectives to further embed equality and diversity into the delivery of Council activities. The action plans are populated on the Council performance management system - Pentana and assigned responsible action owners, expected date of completion and notes to evidence how this was completed. This is then monitored and reported quarterly to Cabinet, SEDG and SLT to ensure delivery.</p>
1.5	<p>The EDI strategy's key objectives are clearly linked to:</p> <ul style="list-style-type: none"> <li>• the organisation's values</li> <li>• the organisation's key objectives and strategy</li> <li>• key organisational risks relating to EDI</li> <li>• analysis of data (such as stakeholder analysis, metrics recorded, and key performance indicators).</li> </ul>	✓/✖	<p><b>Organisational Values</b></p> <p>The Equality Framework is centred on the Council's values and there is a defined strand called 'Continuous Improvement and Inclusivity' that speaks to the 'Community Priority' of enabling a resilient, empowered, connected, inclusive and healthy community.</p> <p><b>Key objectives and strategy</b></p> <p>See 'Tone from the Top' 1.2</p> <p><b>Organisational risks relating to EDI</b></p> <p>In Tone from the Top recommendation 1, we have suggested that the Council review its CRR to include EDI related risks and ensure they are appropriately identified</p> <p><b>Analysis of data</b></p> <p>The Council's 2021/24 Equality Framework and Action Plan which was developed considering the LGA framework, has 70 equality actions which sets out the actions the Council has implemented to deliver equality outcomes and activities needed to secure further improvements. As of March 2024, 88% of these actions have been</p>

			<p>completed, recorded on Pentana, and reported to Cabinet. The 2024/27 equality actions are taking a different approach of decentralising these actions into service areas produced plans containing specific actions that are designed to meet the objectives and high-level themes that are set out in the Gedling Plan.</p> <p>For 2024/25, 16 actions have been identified and distributed into four service areas to be achieved by 31 March 2025. The new approach proposed from 2024 will help embed equality actions into annual service plans rather than having them as standalone equality plans.</p>
1.6	Clear and measurable outcomes, outputs and deliverables have been documented with appropriate leads and timescales.	x	<p><b>EDI Action Plans within Service Plans</b></p> <p>There are sixteen equality actions stated in the Gedling Plan to be embedded within the annual service plans, providing a good understanding of what needs to be done, with target completion dates provided for each action to track progress, also each action item has an assigned accountable lead, with 'Notes' included for actions which provides additional context or updates on the action's status.</p> <p>While actions are generally clear in their intent, e.g EQU01 'Undertake Data analysis of hate crimes' and EQU03 'Deliver Health inequalities work in targeted localities in Carlton, Netherfield etc,' many lack specific, measurable outcomes or outputs. For example:</p> <ul style="list-style-type: none"> <li>•EQU02: "Drive forward service interventions identified in the Strategy, including greater integration with health and wellbeing partners to address health inequality" does not specify what constitutes success or how progress will be quantified.</li> <li>•EQU06: "Provide training and support across services to improve complaint responses in relation to equality related complaints" while intent is clear, it lacks specifics on the type of training, measurable improvement targets or define deliverables doesn't define how these gaps will be measured or what constitutes a "gap".</li> <li>•EQU07: "Enable a more co-ordinated assessment of data sources in planning and decision making". The action appears unclear without specific methods, measurable outcomes or defined deliverables</li> </ul> <p>Council to review all actions to ensure they have specific, measurable outcomes or outputs, where possible, add quantifiable targets and clearly define deliverables for each action.</p> <ol style="list-style-type: none"> <li>1. Revise each action to include specific, measurable outcomes e.g EQU03 can read 'Reduce health inequality gap in Carlton and Netherfield by X%' to be measured by a specific metric</li> <li>2. Define clear deliverables for each action clearly stating the tangible outputs expected. For example, EQU01 'Produce a comprehensive</li> </ol>



			data analysis report on hate crimes including trend analysis and recommended interventions, by Q3 2024’.
2.	Operational Planning		
2.1	The organisation has a structured and risk-based approach to embed relevant and proportionate EDI considerations in the design of change programmes, services, policy changes, new capital projects, and initiatives.	✓	Equality Impact Assessment (EIAs)
			<p>Th Council has published an equality impact assessment (EIA) template and guidance which outlines its requirements for carrying out EIAs when developing new policies to ensure there is a standard approach to equality analysis/ impact assessment of policy and service decisions. The guidance, which is published on the Council’s website is dated 2016. As part of the Equality framework, it is intended that this will be reviewed.</p> <p>There is a section of the EIA template which requires the decision maker to consider the impact the programme they are undertaking will have on the protected characteristics (age, race, religion, sexual orientation etc) of both external (residents, local businesses etc) and internal (staff) groups.</p> <p>To demonstrate this, 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 on the above stated groups.</p>
2.2	Operational plans are supported by evidence and analysis of available EDI data.	✓	Embedding into daily operations
			<p>As stated in 1.2, the Framework and Action Plan include actions each year which will form part of Service Plans and link to the Gedling Plan objectives to further embed equality and diversity into the delivery of Council day-to-day functions.</p>
3.	Compliance		
		✓	Public Sector Equality Duty

3.1	The organisation has a defined framework for identifying applicable legal and regulatory standards (such as PSED) and demonstrating compliance with them.		<p>The Council's legislative framework is outlined in its Equality and Diversity Policy and includes reference to:</p> <ul style="list-style-type: none"> <li>• The Public Sector Equality Duty</li> <li>• The Equality Act 2010 (the Act)</li> <li>• Gender Pay Gap Regulation 2017</li> </ul> <p>In demonstrating compliance, the Council has:</p> <ul style="list-style-type: none"> <li>• Established an Equality Impact Assessment template</li> <li>• Published its Equality Information</li> <li>• Consulted and Engaged with its communities</li> <li>• Provided equality and diversity training and awareness to staff and Members</li> </ul> <p>And in exercise of its functions have committed to having due regard to the need to: eliminate discrimination, harassment victimisation, and any other unlawful conduct prohibited by the Act, advance equality of opportunity and challenge prejudice, to advance the achievement of equality and the fostering of good relations between diverse groups in the Borough.</p>
3.2	The organisation has publicly disclosed relevant actions taken to fulfil the PSED.	✓	<p>In fulfilment of its commitment to promoting and providing equality and diversity in all areas of responsibility both as a major employer and community provider the Council has published on its website:</p> <p>Equality Information</p> <p>Equality and Diversity Consultation for 2024</p> <p>Gender Pay Gap data 2024</p> <p>Pay Policy Statement 2024-25</p> <p>Equality and Diversity Policy</p> <p>We have seen the new Equality and Diversity Policy for 2024/27, which has been approved by the Council's Cabinet on 7 October 2024 and published on its website.</p>
4.	<b>Pay Gap Analysis</b>		
4.1	The organisation has carried out a gender pay gap analysis and have published the results in the current reporting period.	✓	<p>The Council reports annually on its Gender Pay Gap and as of August 2024 presented the data to Senior Leadership Team to determine whether any actions are required to achieve a gender-neutral state in terms of mean pay differential. The report was further reported to the Portfolio Holder for Young People and Equalities and Joint Consultative and Safety Committee. We confirmed the Gender Pay Gap data has been</p>

			uploaded onto the Council website for 2024 and published on the relevant government website. The Council has also prepared and published its annual Pay Policy Statement for 2024.
4.2	Root cause analysis has been undertaken to interpret gender pay gap data.	✗	<p>We reviewed the Council Gender Pay Gap report and noted that while the report provides useful data and context on the gender pay gap and recognises that the lower quartile has a disproportionate number of female employees, the report does not provide detailed breakdowns that could help identify root causes and does not propose specific action plan to address the existing gap or prevent it from widening.</p> <ul style="list-style-type: none"> <li>• Council to conduct detailed analysis of pay structures and career progression</li> <li>• Analyse the impact on part-time work on career progression and pay, given the high proportion of women in the lower quartile</li> <li>• Set realistic but ambitious targets such as increasing the proportion of men in the lower quartile or women in the upper quartile by a specific percentage within a defined timeframe.</li> </ul>
4.3	Gender pay gap data is cross-referenced with other forms of data (such as ethnicity, working patterns, age) collected by the organisation to understand if there are any further trends and concerns affecting specific sub-groups.	✗	<p>While we recognise the Council has plans to participate in the planned government intention to produce Ethnicity Pay Gap data, there is presently no cross referencing of gender pay gap with any other forms of data at the Council.</p> <p>It is recognised that there may be scope for further analysis of how gender interacts with other factors to influence pay and career progression.</p> <p>To provide more understanding of pay disparities and help develop more targeted and effective strategy to address inequalities, council should consider:</p> <ul style="list-style-type: none"> <li>• Analyse the data collected on its equality information to understand how different characteristics combine to affect pay</li> <li>• Investigate how factors like age, ethnicity and working patterns correlate with gender in different pay quartiles</li> <li>• Explore whether certain age groups face compounded disadvantages in pay and progression</li> </ul>

4.4	The organisation has formally considered if other forms of pay gaps (e.g. disability, ethnicity) are relevant and have carried them out accordingly.	✗	<p>This is currently not been undertaken at the Council. The Council has not formally conducted analysis on pay gaps related to other protected characteristics, such as disability and ethnicity to provide valuable insights into the organisation's equality landscape</p> <p>Conduct a formal review to assess the relevance and feasibility of analysing pay gaps related to other protected characteristics to inform and enhance the council's broader equality, diversity and inclusion strategies and action plans.</p>
4.5	Specific, measurable, achievable, realistic and time-bound (SMART) actions have been identified that clearly address root causes and assigned to appropriate leads.	✗	See Recommendation in 4.2 above
5.	<b>Third parties</b>		
5.1	There is a structured process to ensure that outsourced providers are aware and aligned to the organisation's EDI requirements.	✓	<p>The Council's Equality and Diversity Policy 2024/27 requires that procurement and commissioning processes and practice take account of the diverse needs of clients. To ensure compliance 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, providing useful Equalities Information on the contractor as part of the tender process. There is also a Procurement instruction form which ask whether specific equality implications need to be considered as part of the procurement process. Sample contracts were seen, showing standard equality clauses included in them.</p>

## Assessment of maturity for this element

	Immature	Aware	Defined	Mature	Continuous Improvement
Current		✓			
Target			✓		

## Recommendations for improvement - GOVERNANCE, COMPLIANCE, AND STRATEGY

1. The Council to review all actions to ensure they have specific, measurable outcomes or outputs, where possible, add quantifiable targets and clearly define deliverables for each action.
2. Revise each action to include specific, measurable outcomes e.g EQU03 can read '*Reduce health inequality gap in Carlton and Netherfield by X%*' to be measured by a specific metric
3. Define clear deliverables for each action clearly stating the tangible outputs expected. For example, EQU01 '*Produce a comprehensive data analysis report on hate crimes including trend analysis and recommended interventions, by Q3 2024*'.
4. The Council to conduct detailed analysis of pay structures and career progression
5. Analyse the impact on part-time work on career progression and pay, given the high proportion of women in the lower quartile.
6. Set realistic but ambitious targets such as increasing the proportion of men in the lower quartile or women in the upper quartile by a specific percentage within a defined timeframe.

7. Analyse the data collected on its equality information to understand how different characteristics combine to affect pay.
8. Investigate how factors like age, ethnicity and working patterns correlate with gender in different pay quartiles.
9. Explore whether certain age groups face compounded disadvantages in pay and progression.
10. Conduct a formal review to assess the relevance and feasibility of analysing pay gaps related to other protected characteristics to inform and enhance the council's broader equality, diversity and inclusion strategies and action plans. This can involve comparing the mean pay gap between races or ethnicity on an hourly rate basis, examining/analysing the difference in average bonus pay.

EDI Maturity Assessment - Structure			
1.	Committees, Networks and Forums	✓/✗	Evaluation
1.1	The need for committees, representative networks and forums (staff and service users where appropriate) are formally identified.	✓	<b>Strategic Equality and Diversity Group (SEDG)</b>
			<p>The Council has established the Strategic Equalities and Diversity Group (SEDG) to provide corporate leadership, ensure commitment in meeting the Council's Public Sector Equality Duty under the Equality Act 2010, and to ensure it demonstrates fairness in its delivery of services and in its employment practices.</p> <p>The SEDG is chaired by the Portfolio Holder for Young People and Equalities</p> <p>The SEDG also has a broad membership with representative and executive functions across the Council, including:</p> <ul style="list-style-type: none"> <li>• Policy Advisor for Young People and Equalities</li> <li>• Leader of the Council</li> <li>• Deputy Leader of the Council</li> <li>• Other Members of Cabinet who may wish to attend</li> <li>• One Member from each of the opposition groups</li> <li>• Chief Executive</li> <li>• Director with lead responsibility for equality and diversity (currently the Director of Corporate Resources)</li> <li>• Head of Governance and Customer Services which is the Head of Service with overarching responsibility for delivery of the Action Plan within the Gedling Plan</li> </ul> <p>Other people may be invited to attend e.g. officer representatives from specific council services.</p> <p>The SEDG reviews annual reports in relation to the delivery of the council's Strategic Equality Framework and Action Plan and report the achievements and areas of improvement to Cabinet.</p>
			<b>Officer Equality and Diversity Group</b>
			<p>The Officer Equality and Diversity Group is a support subgroup convened by the SEDG to:</p> <ul style="list-style-type: none"> <li>• Ensure performance management of equality actions against framework and action plan, ensuring deliverability on an operational level</li> <li>• Review Equality framework and action plans and ensure it remains up to date</li> <li>• Analyse equality related complaints, comments, and compliments to identify trends and areas for improvement or positive practices</li> <li>• Challenge bad practice</li> <li>• Consider/identify corporate training needs</li> </ul> <p>The above among others are the remit of the Officer Group and members are the Director of Corporate Resources, Head of Community and Leisure as well as the Head of Human Resources, Performance and Service Planning.</p>
			<b>Gedling Inclusion Group Support (GIGS)</b>

			<p>The Council has a staff-based equality network, the Gedling Inclusion Group Support (GIGS) established as a proactive forum to drive positive change in equality, diversity, and inclusion across the Council. Acting as an objective and confidential platform, GIGS aims to bridge communication gaps between departments, collect representative data on staff experiences, and promote awareness of diverse cultures and protected characteristics. The group serves as a resource for both staff members to raise concerns and for departments seeking guidance on equality matters.</p> <p>The group is very well represented as it's got representatives from all the teams across the organisation. The group consists of members from various departments and roles within the organisation, including:</p> <ul style="list-style-type: none"> <li>• Customer Services Manager (Chair)</li> <li>• Democratic Services representative (Vice Chair)</li> <li>• Customer Service Advisor/HSSF (Secretary)</li> <li>• Customer Service representative</li> <li>• Legal Manager</li> <li>• Casual Reception/Swim Scheme representative</li> <li>• Aquatics and Inclusivity representative</li> <li>• GMB/Parks representative</li> <li>• Representatives from other departments</li> </ul> <p>By bringing together representatives from various departments and levels within the organisation, GIGS seeks to ensure that all voices are heard, and that equality, diversity, and inclusion principles are embedded throughout the council's operations.</p>
1.2	Committees, networks and forums have documented terms of reference that are aligned to the organisation's governance structures. Terms of reference provide sufficient empowerment to escalate issues to relevant senior staff.	✓/✗	<p>We reviewed the terms of reference for the following groups:</p> <ul style="list-style-type: none"> <li>• Strategic Equality and Diversity Group (SEDG)</li> <li>• Officer Equality and Diversity Group</li> <li>• Gedling Inclusion Group Support (GIGS) draft</li> </ul> <p>We noted the following:</p> <ul style="list-style-type: none"> <li>• The terms of reference outline the need to set and monitor an annual workplan, like the Equality Framework and Action Plans.</li> <li>• The Officer Equality Group, Terms of Reference is not standardised, as the aim/purpose of the group, frequency of meeting, members, as well as reporting or escalation path was not stated.</li> <li>• GIGS has a draft term of reference, stating the purpose and remit of the group, frequency of meeting, roles and responsibilities, and list of members. There is no defined escalation path or reporting line within the guide to show how information is fed back to management.</li> </ul> <p>Council should develop formal terms of reference for the Officer Equality Group as part of its</p>



			<p>governance structure and make clear the distinction between representative and executive forums. The group should be made up of appropriate senior leaders across services to ensure that EDI can be embedded in operational areas.</p> <p>Terms of reference for GIGS to be completed and reviewed for consistency of language, updated to include clear escalation and feedback pathway. (We have provided a sample of best practice ToR template as seen in other Public sector organisations we have worked with.</p>
1.3	Decisions based on information escalated are fed back.	✓	The SEDG and Officer Equality and Diversity Groups have escalated to Cabinet and the Overview and Scrutiny Committee on the Equality actions and public consultations outcome on the Equality and Diversity policy and this has been taken onboard by both Cabinet and the Committee.
1.4	There is visible senior executive sponsorship of established committees, representative networks and forums where appropriate.	✓	As noted above in Structure 1.1, the SEDG is chaired by the Portfolio Holder for Young People and Equalities, the Officer Equality and Diversity Group has Directors and Heads of Service as members while GIGS is chaired by the Customer Services Manager and vice chaired by the Head of Democratic Services.
1.5	Committees, representative networks and forums meet with sufficient regularity to discharge their responsibilities.	✓	<p>There is evidence the various equality groups meet regularly at the council, in alignment with the frequency of meeting stated within their terms of reference, to discharge their responsibilities.</p> <p>The Strategic Equality and Diversity Group (SEDG) has met four times between September 2023 to June 2024</p> <p>The Officer Equality and Diversity Group, between March 2023 and May 2024 has met six times</p> <p>The Gedling Inclusion Group Support (GIGS) although stated it would meet monthly for the first six month following establishment and quarterly thereafter, has had four meetings between December 2023 and May 2024</p>
1.6	Committees, representative networks and forums maintain action logs that are monitored.	✗	<p>The GIGS, SEDG as well the Officer Equality groups allocate actions to members at every meeting although a log is not maintained for follow up.</p> <p>They intend to record action items in a log. A review of the action log will be a standing item on the agenda.</p> <p>Action logs arising from networks and groups should detail specific, measurable, achievable, realistic, and time-bound (SMART) actions, assigned to appropriate leads</p>
1.7	The organisation proactively consults committees, networks and forums before change initiatives. Consultation can be sufficiently evidenced.		<p><b>Equality Policy</b></p> <p>The Equality policy aims to achieve this through one of its commitments which states ‘we will design our plans, policies and practices to meet the needs of all our communities by using detailed research and data, consulting and engaging with relevant stakeholders and the communities, having regard to their views, following our legal duties and using our experience of good practice.</p>

			This has however not been evidenced as the staff network is still in its infancy
1.8	Accessibility to committees, representative networks and forums is considered and measures are implemented where reasonable.	✓/✗	<p>We noted that that accessibility has been considered from the point-of-view of physical attendance at meetings.</p> <p>In discussion with the GIGS leadership there could be additional steps to improve accessibility to networks in other ways such as ensuring those who have not publicly disclosed their sexuality or gender are able to participate safely such as through confidentiality notices.</p>
<b>2. Resources</b>			
2.1	Resource requirements have been identified in line with the organisation's EDI vision and strategy and budget allocated.	✓	The Council's EDI function sits currently within the Deputy Chief Executive's office with shared responsibility with the Strategic Equality Diversity Group (SEDG) and resourced within the same directorate.
2.2	Where there is an EDI Function/dedicated EDI staff, the structure of the organisation allows for it to be sufficiently holistic in its approach.	✓	<p>While the Council's EDI lead is the Deputy Chief Executive, we were informed the ongoing restructuring at the Council, will see the EDI function being repositioned within the Organisational Development Team.</p> <p>This risk of the function not being sufficiently holistic will likely be reduced over time through:</p> <ul style="list-style-type: none"> <li>• SEDG role</li> <li>• The designation of the Executive Lead for EDI being the Deputy Chief Executive</li> <li>• The EDI strategy being holistic in its remit and action plans being embedded within service plans.</li> </ul>
2.3	The organisation has assessed its reliance on staff volunteers in administering representative networks and forums.	✗	<p>We discussed this with GIGS group leaders and noted the group has just been created and still at its infant stage, but from interaction with colleagues, there is no good support from line managers for network-related work, as they have to this at their own time sacrificing lunch breaks as there is a substantial amount of administrative work that comes with managing networks such as minutes, action log tracking, and agendas.</p> <p>The Council has not formally agreed upon documented protected time for leaders of staff network groups to undertake group activities. This absence of officially sanctioned time may hinder the growth of staff forums, effectiveness and sustainability of these staff-led network. This could lead to inconsistent support across different departments or managers resulting in inequitable opportunities for staff network engagement</p> <p>Council to formally document and implementing a policy that allocates protected time for network leaders.</p> <p>Ensure that line managers are aware of and supportive of this, incorporating it into workload planning and performance discussions.</p>

2.4	Regular review takes place of ongoing resource requirements.	✓	In discussion with the Deputy Chief Executive as the Executive with lead responsibility for EDI at the Council, this is an area that the Council is constantly reviewing but due to the present financial constraints they are not able to have a dedicated staff for EDI function but with scope for this in the future.
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Assessment of maturity for this element					
	Immature	Aware	Defined	Mature	Continuous Improvement
Current			✓		
Target				✓	

Recommendations for improvement - STRUCTURE	
<ol style="list-style-type: none"> <li>1. The Council should develop formal Terms of Reference for the Officer Equality Group as part of its governance structure and make clear the distinction between representative and executive forums. The group should be made up of appropriate senior leaders across services to ensure that EDI can be embedded in operational areas.</li> <li>2. A Terms of Reference for GIGS to be completed and reviewed for consistency of language, updated to include clear escalation and feedback pathway. (We have provided a sample of best practice ToR template as seen in other public sector organisations we have worked with).</li> <li>3. Action logs arising from networks and groups should detail specific, measurable, achievable, realistic, and time-bound (SMART) actions, assigned to appropriate leads</li> <li>4. The Council to formally document within the GIGS ToR a process that allocates protected time for network leaders and ensure that line managers are aware of and supportive of this, incorporating it into workload planning and performance discussions</li> </ol>	

EDI Maturity Assessment - Policies, Procedures, Training and Development			
1.	Policies and Procedures	✓/✗	Evaluation
1.1	An EDI policy framework has been implemented, with key relevant policies identified.	✓	<b>Equality Diversity and Inclusion Policy 2024-27</b>
			The Council has recently updated its Equality Diversity and Inclusion Policy which is supported by the it's Equality and Diversity Framework and Action Plan which provides an annual operational programme of equality actions linked to the Gedling Plan and service plans. The policy is intended to be valid from 2024 to 2027. The policy signposts to several other council policies such as Recruitment and employment policies and standards, Code of Conduct for Members, Complaints, Compliments and Comments policy, Procurement equality standards, Equality objectives. Gedling Plan, Equality Framework and Action Plan. This is also linked to the Equality Impact Assessment guidance to analyse the effects of policies, procedures, and services on people and make sure Council decisions are fair, informed and lawful.
1.2	Policies are subject to regular review and there is a structured process to align them with key legal and regulatory standards that the organisation is subject to.	✓	<b>Review of Equality Policy</b>
			The Council plans its Equality Diversity and Inclusion policy will be regularly reviewed at least every 3 years to ensure it remains fit for purpose. They will ensure they engage with residents and staff to enable this policy to be reviewed, considering the views of those who use its services or work for, or with the Council.
1.3	There is a structured process to evaluate the organisation's policies alongside peers and incorporate good/best practice.	✓	The Director of Transformation, with responsibility for People and Organisational Development is a member of the Nott HR group where best practices on EDI are shared and discussed and uses this approach to network with other Council and engage in peer learning to ensure that policies incorporate good/best practice.
1.4	Policies clearly distinguish between expected behaviours and practices in line with the organisation's values, vision, and EDI strategy and those that are unacceptable.	✓	The Equality, Diversity and Inclusion policy covers this under section 5.9 which states; <i>'All employees have a personal responsibility to act in accordance with Equality law and other codes of conduct and policies endorsed or adopted by the Council which govern acceptable behaviour. Employees have a personal responsibility to ensure that the Council's commitment to equality and diversity is fulfilled and that this policy is complied with. Failure to comply with this policy will always be investigated under the Council's Disciplinary Procedure and may result in disciplinary action'</i> .
1.5	Policies and procedures are designed to ensure that there are no negative and unjust consequences for those that have raised issues, concerns and highlighted areas of non-compliance to policies and/or legislation.	✗	While the Council Whistleblowing policy does state that 'The Council is also committed to preventing any harassment, victimisation or unfair treatment of any person arising from their whistleblowing, and where appropriate, take disciplinary action against any member of staff responsible for such harassment, victimisation or unfair treatment against a whistleblower', The Equality Diversity and Inclusion policy as well as the Complaints

			<p>Compliments and Comments Policy does not address consequence of raising concerns about negative treatments.</p> <p>This should be incorporated into Council policies, particularly as it concerns EDI. The Council should map its processes and make clear the distinction between preventative and detective processes.</p>
1.6	Procedures to address non-compliance with policies differentiate between genuine mistakes (where systems are undeveloped, risky behaviours (where systems need to be improved, and more training is required) and reckless behaviours (where systems and processes are set up to encourage compliance but there is deliberate override) while acknowledging the potential for harm regardless of intent.	-	This should be incorporated into the Council policies.
1.7	Policies and procedures are designed to ensure that senior leaders are subject to the same standards of behaviour as other staff.	-	This should be incorporated into the Council policies
1.8	Policies are accessible and communicated throughout the organisation.	✓	We were advised that all Council policies are available and easily accessible to staff on the intranet, and we confirmed ease of access to a number of these policies on the Council's website for easy access by the public.
<b>Training and Development</b>			
2.1	Role-relevant training is available during induction and is refreshed at periodic intervals.	✓ / x	<p><b><u>Mandatory Training</u></b></p> <p>Equality Diversity and Inclusion is a mandatory training at the Council carried out via an e-learning module provided by Meritec. All starters at the Council are required to complete this as part of their onboarding requirement with a refresher mandated every 3years. The training is available on the Council intranet page for easy accessibility and refresher. In compliance with the Council EDI policy, the provision of training for Members and officers in relation to equality and diversity awareness are provided at the Council. Trainings were also provided to officers in relations to the consideration of human rights impacts in report writing and decision making.</p> <p>We noted the Council mandatory training advises staff to discuss with their line managers if they suspect a case of discrimination or have concerns about the operation of the EDI policy in their work area, however there were no role-specific trainings provided in this regard.</p> <p>There is a gap in specific training for managers detailing how to approach these conversations and how to resolve these (either formally or informally).</p> <p>Manager specific trainings should be provided to equip these staff with requisite knowledge to manage and handle difficult discussions around unconscious bias and managing microaggressions</p>

2.2	Training content contains reference to applicable legal and regulatory standards.	✓	<p>The Council mandatory e-learning content covers primarily The Equality Act 2010 (the Act).</p> <p>The training covers the Public Sector Equality Duty (PSED) outlining both the general and specific duties as applicable to the Council</p> <p>The content also addresses the protected characteristics defined by the Equality Act and explains the different types of discrimination that are prohibited by law. It also references the Human Rights Act 1998, as the statutory body with the responsibility to encourage equality and diversity, eliminate unlawful discrimination, and protect and promote human rights</p>
2.3	Training content communicates the organisation's values, expectations, key policies and practices.	✓	<p><b>Mandatory Training Content</b></p> <p>The Council's mandatory e-learning effectively communicates its core values, expectations and key policies related to equality and diversity. It provides an overview of legal requirements and organisational practices.</p> <p><u>Organisational Values</u></p> <ul style="list-style-type: none"> <li>• Inclusivity and Respect: the training emphasises respect for diversity and the importance of creating and inclusive environment. Stating that valuing differences is a core organisational value</li> <li>• Fairness and Equal Opportunity: The training's definition of equality and diversity highlights its commitment to fairness and equal opportunity for all stakeholders</li> <li>• Legal Compliance and Ethical Behaviour: The training underscores the importance of compliance with the Equality Act 2010, reflecting the Council's value of operating within legal and ethical frameworks</li> </ul> <p><u>Expectations</u></p> <ul style="list-style-type: none"> <li>• Employee Conduct: the training clearly states all employees to recognise and respect equality and diversity in their work activities and emphasises zero tolerance for bullying, harassment, or discrimination. Employees are also expected to be aware of their own biases both conscious and unconscious and learn to manage them</li> <li>• Managerial Responsibilities: Specific guidance is provided for managers, highlighting their role in addressing equality and diversity issues within their teams.</li> </ul> <p><u>Key Policies and Practices</u></p> <p>The training mentions two key policies; The Equality and Diversity Policy 2021-24 for supply of services as well as the Equality Policy (Employment) that applies to all employees stating they can be found on the Council intranet. It provides an overview of the Equality Act 2010 and its implications to the Council and the Public Sector Duty requirements. The training outlines the protected characteristics as defined by the Act</p>

			and informs employees about the grievance procedure for making complains related to Equality and Diversity.
2.4	Training content is regularly reviewed to include the most current organisational practices and to incorporate latest developments in applicable legal and regulatory standards and/or best practice.	✓	While the training content does not show a timestamp to indicate how recent they were, it mentions the Equality and Diversity Policy 2021-2024, references the Equality Act 2010, which is still the current primary legislation for equality in the UK. The training covers the most current list of protected characteristics and included modern concepts like discussions around unconscious bias and non-binary gender identities. Furthermore, we were informed by the Director of Transformation that the current mandatory training had been produced bespoke to the Council by Meritec in 2022.
2.5	Training records are maintained.	✓/x	<p>Council have commissioned Meritec to provide bespoke EDI Trainings. Training compliance figures for the period covering April 2023 to March 2024 shows 216/430 (50.2%) of staff have completed this.</p> <p>Trainings at the Council are administered through Meritec eLearning platform, including the EDI trainings, despite about half population of Council staff not having access to computers to complete these trainings, due to the nature of their jobs e.g frontline staff with varying shift patterns like those in Leisure services, Depo staff like Parks teams, Waste services etc.</p> <p>The Director of Transformation confirmed this is being reviewed by the Council as budget has been established to pay this class of staff overtime, to take the trainings outside of their normal working hours after their shifts. Also, for staff based in the Depos, there is a plan to use an internal resource to facilitate face-to-face EDI trainings at the depo for these group of staff.</p> <p>Develop role-specific EDI content relevant to different service areas</p> <p>Consider including and providing EDI trainings during team meetings or briefing</p> <p>Regularly assess training effectiveness across different delivery methods</p>

Assessment of maturity for this element					
	Immature	Aware	Defined	Mature	Continuous Improvement
Current		✓			
Target			✓		

**Recommendations for improvement - Policies, Procedures, Training and Development**

1. Manager specific training should be provided to equip staff with requisite knowledge on inclusive leadership skills, how to support staff as well as handle difficult conversations around unconscious bias and managing microaggressions.
2. Manager training should also include how to embed EDI considerations through service plans and business cases through the equality impact assessment toolkit.
3. In addition to developing alternative training formats (e.g face-to-face sessions, workshop activities) and allocation of budget and protected time for non-office-based staff to complete EDI trainings, the Council should consider implementing mobile-friendly learning options for staff without access to PCs but with access to smartphones.
4. Develop role-specific EDI content relevant to different service areas as well as consider including and providing EDI trainings during team meetings or briefing.
5. Regularly assess training effectiveness across different delivery methods.



EDI Maturity Assessment - Measurement, Accountability, and Continuous Improvement			
1.	Measurement	✓/✗	Evaluation
1.1	There is a structured approach to identify data the organisation needs to record to meet its legal and regulatory requirements.	✓	<p>The Council collects data on residents and its employees in respect of the protected characteristics, and all data collected are GDPR/DPA compliant. Equality information is collected by Human Resources, Housing Needs and Leisure, reported to Senior Leadership Team and published on the Council's website in its Equality Information document as well as on the "Equality and Diversity" page on the intranet. Also, the Council's Data Hub which is a rich source of equality, diversity and inclusion data, now includes links to the current Census (2021).</p> <p>When conducting public consultation, a standard set of EDI questions are now being used for all consultation exercises, allowing for full analysis of issues and how they might relate to protected characteristics. Also Census data has been used by Democratic Services to establish the makeup of the electorate as part of work to improve accessibility under the Elections Act 2022</p>
1.2	Key performance Indicators (KPIs) are defined in line with desired outcomes outlined in the EDI strategy.	✓	<p>The Council in its 2020-23 Equality and Diversity Framework had 70 actions in its Action Plans, created against the Local Government Association Equality Framework for Local Government, with 62 of these completed within target period. The new Equality policy has proposed a new approach from 2024 to embed equality actions into annual service plans. Each service area will then produce a service plan which contains specific actions that are designed to meet the objectives and high-level themes which are then set out in the Gedling Plan (Council annual business plan) and monitored annually. Currently this plan runs from 2023 to 2027.</p>
1.3	The rationale for organisational-level KPIs is documented and clearly considers the behaviour that will be implicitly or explicitly encouraged by the organisation.	✗	See Governance, Compliance, and Strategy 1.6.
1.4	If there is an EDI Function/EDI staff, sufficient distinction is made between organisational KPIs and EDI Function KPIs.	-	<p>There is no designated EDI function at the Council presently, as this is overseen by the Director with responsibility for EDI who has been recently appointed as the Deputy Chief Executive. The Council has introduced a Strategic Equality and Diversity Group which is chaired by a cabinet member and fully serviced through senior officers and a PA. Whilst no single person is designated as Equality Officer the work associated with the delivery of actions is progressing as equality action plans have been embedded into service plans to be managed by the Assistant Directors/Heads of Services. Whilst this subject area is extremely important for the Council, it has expressed difficulty in funding resources for a dedicated officer.</p>
1.5		✓	<b>Employee Data</b>

	Systems are in place to collect and interpret data in line with requirements above.		<p>Employee data is collected and analysed through the Council's HR system, Zellis.</p> <p><b>Council Service data</b></p> <p>The Customer Services department collects Equality data for residents and service users which is then analysed by Council. As part of work to improve accessibility, Census data is also analysed by the Democratic Service team to establish the make-up of the electorate. Also to allow for full analysis of issues and how they might relate to protected characteristics, when conducting public consultation, a standard set of EDI questions are now used for during the exercise.</p>
<b>2.</b>	<b>Accountability</b>		
2.1	<p>Actions contained in action logs are completed in a timely manner and significant slippages are challenged.</p> <p>Where actions will not be taken, this is clearly communicated.</p>	✓	<p>The Councils Equality Action Plans for 2023/24 contained 70 actions which are allocated a named senior officer within the council and a time by which they must be completed and are updated on the Council's performance management system Pentana. We found as of March 2024, 88% of these actions have been completed, recorded on Pentana, and reported to Cabinet. This was confirmed by the SEDG, supported by the Officer's Equality Group.</p> <p>The newly updated 2024-27 Equality and Diversity Policy, has defined a new approach for equality actions to be embedded into Service plans. Overall, 16 EDI actions have been identified, distributed into 12 services and recorded on the Pentana performance management system to be monitored annually.</p>
2.2	The organisation communicates decisions clearly and engages with internal and external feedback.	✓	<p><b>Internal Feedback</b></p> <p>As noted in 1.3 under Structure, the Council with internal feedback from the Strategic Equality and Diversity Group as well as the Officer Equality and Diversity group but no escalations have been received from the Gedling Inclusion Group Support (GIGS) having been newly created.</p> <p><b>External Feedback</b></p> <p>The 'Have Your Say' and 'Consultation' pages on the Council website shows the council constantly seeks resident's view on its activities. There is a Consultation response form for members of the public wishing to participate, to complete. The page further lists current and future consultations with dates and background documents.</p> <p>See Tone form the Top 1.1 and for details of EDI consultations.</p> <p>We confirmed the Council has published on its website, the Equality and Diversity Consultation report for 2024, stating actions it has taken so far to address engagement outcomes</p>

2.3	EDI is a defined management competency.	x	<p>As stated under Training and Development 2.1, EDI is implicitly a management competency as the training content directs staff to their line managers whenever they have concerns.</p> <p>However, there is a gap in equipping managers with requisite competencies to carry this out effectively. As part of Policies, Procedures, Training and Development, we have recommended that further managers' training be developed (See Recommendation 1 in Policies and Procedures)</p>
<b>3.</b>	<b>Continuous Improvement</b>		
3.1	The performance and management framework is linked to organisational values.	✓	<p>As contained in the Gedling Plan 2023-27, the Council Leader stated "our actions to ensure that equality, diversity and inclusion is a golden thread that runs through the delivery of plans across all services" underpins all works. The new approach for Equality and Diversity as captured in the Equality and Diversity Policy 2024-27, is to embed equality actions into annual service plans rather than have them as standalone action to ensure achievement of Council objectives set out under s149 of the Equality Act 2010. This is confirmed under the 'Community' theme of the Gedling Plan specifically within the objective to, "Provide opportunities for all people to connect and live, work and socialise together, and have equal access to services". To ensure delivery, key service-based actions have been approved for inclusion and reporting to Cabinet. Quarterly progress update on the actions which have been recorded on the Pentana performance management system will be reported to the SEDG, chaired by the Portfolio Holder for Life Chances and Vulnerability.</p>

3.2	Data collected is interpreted and presented as useful and relevant management information that is used to inform operational and strategic decision making.	✓	<p>The Council collects and publish information and data on the profile of its communities and the extent of inequality and disadvantage.</p> <p>Internally on the intranet page, the Data Hub provides an easily accessible online portal for access to data that informs and evidence decision-making, service planning and other project work. Service user data are collected at the Council Leisure centres and Housing Needs, with reference to protected characteristics to support equality analyses and equality impacts assessment. Additionally, Council's Complaints, Compliments and Comments Policy for managing customer feedback allows Customer Services to contact customers to evaluate appropriateness of response. Quarterly, these Customer satisfaction surveys are then entered onto the Council's corporate performance management system, analysed and reported to Senior Leadership Team, to ensure customers' experiences are analysed and remedial action is identified and acted upon. This is further reported annually to Cabinet and Overview and Scrutiny Committee.</p> <p>At the end of the process Customer Services may contact customers to evaluate the response. The aim of this is to provide information to help the Council determine effectiveness of response and service provided.</p> <p>Externally the Council collects data about health inequality, including Public Health England data, Primary Care data, and Nottinghamshire County Council Public Health data together with local qualitative knowledge from working in communities. It also conducts Resident's Satisfaction Survey every 6 months to develop its strategies and understand what residents think and need; and identify any areas where there might be a need for further improvement.</p> <p>The results of the Satisfaction Survey are reported to SLT and Cabinet and this is 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.</p>
3.3	Effectiveness of the EDI strategy is evaluated, with lessons learned analysed and documented.	✓	<p>The Council have held two rounds of public consultations in 2021 prior to approval of its Equality and Diversity Policy document along with the Equality and Diversity Framework and Action Plan for 2021-2024, and another round of consultation between February and March 2024 for the review an update of the policy for 2024-2027.</p> <p>Feedback from the public consultations is analysed and reported to Cabinet and the Overview and Scrutiny Committee. The suggestions for 2024 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</p>

			<p>to eliminate unlawful discrimination as well as using the term 'inclusion' in the policy title.</p> <p>Also, the Council is undertaking an equality and diversity assessment through the Local Government Association (LGA) Equality framework for Local Government. This model sets actions to be completed by the council to deliver good equality outcomes and required actions to be completed for further improvements. Through the framework the Council had set up 70 and completed 62 equality actions for FY 2023/24. Following the assessment against the LGA framework, Council has identified areas where gaps exist to improve its approach to equality and diversity and have now effected this in its new approach of embedding equality actions into service plan actions for 2024/25.</p>
3.4	The organisation is aware of internal and external perceptions of its EDI approach, has sought feedback and taken action as appropriate.	✓	See 3.2 and 3.3 above

Assessment of maturity for this element					
	Immature	Aware	Defined	Mature	Continuous Improvement
Current			✓		
Target				✓	

	Immature	Aware	Defined	Mature	Continuous Improvement
Current			✓		
Target				✓	

Recommendations for improvement - CONTINUOUS IMPROVEMENT
N/A - no recommendations have been raised.

## STAFF INTERVIEWED

BDO LLP APPRECIATES THE TIME PROVIDED BY ALL THE INDIVIDUALS INVOLVED IN THIS REVIEW AND WOULD LIKE TO THANK THEM FOR THEIR ASSISTANCE AND COOPERATION.

Councillor Kathryn Fox	Portfolio Holder for Life Chances and Vulnerability
Francesca Whyley	Deputy Chief Executive and Monitoring Officer
David Archer	Director of Transformation
Lance Juby	Assistant Director for Communities, Leisure and Wellbeing
Natalie Osei	Assistant Director of Governance & Democracy, Deputy Monitoring Officer
Nic Bond	Chair, Gedling Inclusion Groups Support
Emma McGinlay	Vice Chair, Gedling Inclusion Groups Support
Fiona Chandley	PA, Senior Leadership Team

## APPENDIX I - DEFINITIONS

RECOMMENDATION SIGNIFICANCE	
High	A weakness where there is substantial risk of loss, fraud, impropriety, poor value for money, or failure to achieve organisational objectives. Such risk could lead to an adverse impact on the business. Remedial action must be taken urgently.
Medium	A weakness in control which, although not fundamental, relates to shortcomings which expose individual business systems to a less immediate level of threatening risk or poor value for money. Such a risk could impact on operational objectives and should be of concern to senior management and requires prompt specific action.
Low	Areas that individually have no significant impact, but where management would benefit from improved controls and/or have the opportunity to achieve greater effectiveness and/or efficiency.

	Tone from the Top	Governance, Compliance, and Strategy	Structure	Policies, procedures, training and development	Measurement, accountability, and continuous improvement
Continuous Improvement	There is a formal process in place to ensure EDI is embedded into the organisation's strategy, values and key objectives. There is an identified lead for EDI at Board and/or Executive level. Lessons learned are documented. The Board and/or senior management have considered whether there is a need for a Board Diversity Action Plan.	There is a formal organisational strategy that strives for good practice beyond minimum legislative or regulatory standards for EDI that takes into account not just employees but how EDI is incorporated into operations. EDI issues are considered in evidence-based strategic and operational decision-making.	The organisation's representative forums and networks have clear support from senior management. Representative forums have appropriate terms of reference and are proactively consulted to ensure EDI objectives are met.	The organisation's EDI policies and procedures differentiate between and appropriately address genuine mistakes (systems are undeveloped), risky behaviours (where systems need to be improved and more training is required) and reckless behaviours (where systems and processes are set up to encourage compliance but there is deliberate override) while acknowledging the potential for harm regardless of intent. Training is frequently reviewed to incorporate best practice and is role-specific to the organisation's needs. The organisation's policies and procedures are	High quality, accurate and timely information is available to operational and executive management. The organisational performance management framework and reward structure drives improvements in EDI. EDI is a defined management competency. Management assurance is provided on the effectiveness of EDI initiatives on a regular basis.

				designed to ensure that there are no negative and unjust consequences for those that have raised issues, concerns and highlighted areas of non-compliance to policies and/or legislation.	
<b>Mature</b>	There is a clear and formal Board and senior management commitment to EDI, and EDI is considered in Board level processes such as recruitment.	There is a formal organisational strategy in place for EDI that takes into account not just employees but how EDI is incorporated into operations. There is a formal process in place to facilitate consideration of EDI issues in evidence-based operational decision-making, for example, in service planning and new projects. The organisation has a formal process to ensure that regulatory reporting standards are met.	Relevant representative forums are in place with appropriate terms of reference that allow for escalation of issues. Accessibility to forums is considered with areas for improvement identified. Resourcing is regularly reviewed in context of EDI objectives to ensure that there is not an inappropriate amount of additional work is placed on representative forum chairs or leads that is unremunerated.	A framework of EDI policies and procedures relevant to the organisation are in place and subject to regular review. There are formal processes in place to ensure that they take into account legislative and regulatory standards. Training is given that supports the organisation's EDI objectives and clearly communicates expected behaviours. Compliance to training is monitored. Policies and procedures clearly distinguish between acceptable and unacceptable behaviours and are aligned to the organisation's EDI objectives. There are sufficient procedures in place to identify and address undesirable behaviour.	Key performance indicators and success criteria are clearly defined with regard to the EDI strategy, aimed to encourage desired behaviours. Management assurance is provided on the effectiveness of EDI initiatives on an ad hoc basis. Values and EDI are linked to objectives.
<b>Defined</b>	EDI is addressed at senior management and Board level, however there may not be a formal approach.	The organisation has begun to formulate an EDI strategy that is largely focused on EDI in the context of staff and employees.	Relevant representative forums and networks have been identified with some operating effectively.	The organisation has begun to outline a framework of policies and procedures relevant to its EDI objectives and obligations, though not all may be implemented.	Data is collected and turned into meaningful information. Reporting requirements aligned to the organisation's objectives may be



	Senior management and the Board have begun identifying actions to proactively address EDI across the organisation.	There is some consideration of EDI in decision-making, however, this may not yet be consistently applied across all areas of the organisation.	Resourcing is formally considered, however, there may be a significant reliance on unpaid additional work for EDI initiatives.	Some managers are trained in EDI and this is limited to minimum EDI legislative requirements in the workplace. Some procedures are in place to identify and address undesirable behaviour.	defined, however are not yet fully implemented.
Aware	Risks surrounding EDI are escalated to Board level. EDI is implicitly linked to organisational values.	The organisation has a range of EDI programmes and initiatives in place, however, these may not be fully aligned to overarching defined EDI objectives. A documented EDI strategy is not formally in place and there is limited consideration of EDI in decision making.	Some representative forums and networks have been set up. However, there may be a scattered or grassroots approach. These may not be aligned with organisational objectives or governance. Resourcing is not formally considered.	Some EDI policies are in place that are relevant to the organisation's minimum legislative requirements. Objectives of policies and procedures are identified. Gaps have been identified where the organisation could improve. Training gaps have been identified. Policies and procedures may not be effectively communicated or sufficiently accessible across the organisation.	Some measurement of data is collected, with limited management information and analysis produced. However, this is largely aligned to meeting minimum legislative standards rather than defined organisational objectives for EDI.
Immature	Risks with regard to EDI are not considered by senior management and escalated to the Board.	There is a scattered approach to EDI programmes and initiatives.	There are no formal or informal provisions that the organisation is aware of. Resourcing is not considered.	Appropriate policies are not in place and there is not a defined process to ensure that they are up-to-date and meet minimum legislative standards.	Key performance indicators are not identified and measurement of data does not consistently take place.

## APPENDIX II - TERMS OF REFERENCE



### Key Risks

Based upon the risk assessment undertaken during the development of the internal audit operational plan, through discussions with management, and our collective audit knowledge and understanding the potential key risks associated with the area under review are:

- EDI is not sufficiently embedded into the Council's strategy, values, and key objectives (tone at the Top) and given visible support by senior management and Cabinet, leading to EDI not being given sufficient prominence across the Council.
- The strategy for EDI is ineffective or not appropriately monitored leading to inconsistent practice and a silo-approach.
- The process for embedding EDI into service design is ineffective leading to the Council not actively working to reduce inequalities that adversely affect people who share a relevant protect characteristic.
- There is no structured process for embedding EDI into new projects to ensure that accessibility is adequately considered from the outset.
- Committees, working groups and staff forums that discuss EDI issues do not have sufficient terms of reference leading to issues being resolved unsatisfactorily.
- EDI policies and procedures are not appropriately identified and reviewed for legislative compliance and best practice leading to inappropriate practices being endorsed by the Council.
- Policies and procedures are not implemented and communicated, leading to inconsistent practices.
- Adequate training and development is not in place (with regard to the workplace and service users) and monitored leading to the Council not communicating and reinforcing expected behaviours.
- Key performance indicators (KPIs) are either not set, leading to inability to measure success and identify areas for improvement, or inappropriate leading to undesirable behaviours being encouraged.
- The Council being unable to demonstrate that it has taken tangible and reasonable steps to meet the public sector equality duty.



### Scope & Approach

The Equality, Diversity, and Inclusion Maturity Assessment will cover the following elements of equality, diversity, and inclusion:

Tone from the Top

Governance, compliance and strategy

Structure

Policies, procedures, training and development

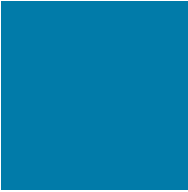
Measurement, accountability, and continuous improvement.

Based on documentary review and interviews with key staff, each element will be judged on a five-part scale between 'immature to continuous improvement' (see Appendix I for details).

The scope of the review is limited to the areas documented under the scope and approach. All other areas are considered outside of the scope of this review. However, Internal Audit will bring to the attention of management any points relating to other areas that come to their attention during the course of the audit.

We assume for the purposes of estimating the number of days of audit work that there is one control environment, and that we will be providing assurance over controls in this environment. If this is not the case, our estimate of audit days may not be accurate.

Our approach will be to conduct interviews and perform documentary review to establish the level of maturity of each of the key elements of EDI considered by the assessment



In delivering this review BDO may need to observe and test confidential or personal identifiable data to ascertain the effective operation of controls in place. The organisation shall only provide the Shared Personal Data to BDO using secure methods as agreed between the parties. BDO will utilise the data in line with the Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR) and shall only share Personal Data on an anonymised basis and only where necessary.

## APPENDIX III - SAMPLE TERMS OF REFERENCE FOR STRATEGIC GROUP

### 1. CONSTITUTION

1.1 The Equality, Diversity and Inclusion Group (EDIG) reports to the Workforce Strategy Committee and has no executive powers other than those specifically delegated in these terms of reference.

1.2 The EDIG serves to provide assurance that the Council has an effective framework within which it can deliver the major projects and initiatives that form part of the Equality, Diversity and Inclusion Strategy.

The EDIG is responsible for:

- ensuring the Council commits to an equality, diversity and inclusion agenda for the benefit of our residents and staff and in line with best practice and current legislation
- monitoring implementation progress of all components of the ED&I strategy in line with national policy requirements;
- supporting and collaborating with the Council to ensure the health needs of the diverse communities we serve are understood and best met
- encouraging and promoting inclusive workplaces free from discrimination and where our diverse staff can flourish
- challenging the organisation, holding it and individuals within it to account, where and when the above does not happen
- ensuring all staff are supported in understanding the Council's commitment to equality, diversity and inclusion and demonstrate this in their roles.

### 2. MEMBERSHIP

2.1 The EDIG will comprise:

- Portfolio Holder (Co-Chair)
- Chief Executive Officer (Co-Chair)
- Care Group
- Care Group Director of
- Care Group Director of
- Chairs: Staff Networks
- Director of Organisational Development
- Deputy Chief People Officer
- Diversity and Inclusion Lead
- Head of Customer Service

### 3. FREQUENCY OF MEETINGS

3.1 The EDIG will meet bi-monthly.

### 4. QUORUM

4.1 The quorum of the EDIG is at least five members, which will include the Chair (Executive Director or Chief Officer). If the meeting is not quorate the meeting can progress if those present determine this. However, no business shall be transacted and items requiring approval may be submitted to the next Workforce Committee meeting as an urgent item.

## **5. NOTICE OF MEETINGS**

5.1 Meetings of the EDIG will be called by the Secretary of the EDIG at the request of the EDIG Co-Chairs.

5.2 Only members can submit relevant items for the agenda. Items for inclusion on the agenda must be notified to the Secretary a minimum seven working days before the meeting. Papers may be submitted less than seven working days before the meeting or tabled at the meeting with the prior agreement of the Co-Chairs.

5.3 Unless otherwise agreed, notice of each meeting confirming the venue, time and date, together with an agenda of items to be discussed and supporting papers, will be forwarded to each member of the EDIG and any other person required to attend, no later than five working days before the date of the meeting.

## **6. ACCOUNTABILITY**

6.1 The EDIG is accountable through the Workforce Strategy Committee for monitoring the delivery and impact of the Organisation's ED&I strategy.

## **7. RESPONSIBILITIES**

7.1 The EDIG will provide advice to the Chief Executive and Cabinet on equality, diversity and inclusion matters. It will also monitor the delivery of the Council's ED&I strategy, advising and agreeing any mitigating or corrective action and / or interventions as appropriate. This will include the following:

- to provide organisational leadership and direction on all matters related to equality, diversity and inclusion
- to determine and make recommendations regarding the Council's strategic direction in relation to equality, diversity and inclusion, taking into account relevant legislation and national initiatives;
- to oversee the implementation of the Council's Equality, Diversity and Inclusion Strategy, Equality Delivery System, Gender and Ethnicity Pay Gap, developing new actions as appropriate and monitoring of outcomes;
- to review and advise on appropriate interventions for equality, diversity and inclusion including assurance when these are completed and assessment of overall impact;
- to provide support and information to all staff to facilitate improvements in the area of equality, diversity and inclusion for residents, staff and our local community;
- to ensure that changes and developments in policy and / or decisions are communicated effectively through the organisation;
- to communicate effectively with residents, staff, senior management and Cabinet members in relation to our equality, diversity and inclusion work.

## **8. AUTHORITY**

8.1 The EDIG is authorised by the Workforce Strategy Committee to investigate / review any activity within the Terms of Reference.

8.2 The EDIG is authorised to approve its own governance cycle.

8.3 The EDIG is authorised by the Workforce Strategy Committee to obtain any external advice it requires to discharge its duties.

## **9. RELATIONSHIP WITH OTHER GROUPS**

9.1 The EDIG will receive reports and items for escalation from the Staff Network Groups.

## **10. REPORTING MECHANISMS**

10.1 The Co-Chairs of the EDIG should draw to the attention of the Workforce Strategy Committee any issues that require disclosure or further action.

10.2 The agenda will be agreed by the Co-Chairs in discussion with the Director of Organisational Development.

10.3 The agenda and papers will be available on request to all members of the Workforce Strategy Committee.

10.4 A formal minute of the meeting will be recorded and a highlight report / items for escalation will be reported to the Workforce Strategy Committee.

10.5 Action items will be recorded at each meeting and a log kept monitoring and reviewing progress. A review of the action log will be a standing item on each agenda.

10.6 The Committee will provide an annual summary of its work and how discharges its responsibilities and submit this to the Board of Directors.

10.7 The Organisational Development Team Administrator will act as Secretary of the EDIG.

## **11. PROCESS**

11.1 To review and make comment to the Workforce Strategy Group on strategic plans regarding the equality, diversity and inclusion agenda.

11.2 To receive and review any reports prior to submission to external stakeholders, where appropriate.

11.3 To review relevant sections of the risk register and / or Board Assurance Framework regularly and report appropriately for equality, diversity and inclusion.

## **12. COMMUNICATION**

12.1 The minutes of each meeting of the EDIG will be formally recorded and submitted to the next meeting of the EDIG for approval.

12.2 The annual report of the Council will contain a section regarding the work on equality, diversity and inclusion.

## **13. MONITORING**

13.1 Attendance will be monitored as part of the agenda for each EDIG meeting, and a matrix of membership attendees will be used for monitoring purposes.

## **14. REVIEW**

14.1 These Terms of reference will be reviewed annually (or sooner, if appropriate) to ensure it is operating at maximum effectiveness and EDIG will recommend any changes it considers necessary to the Workforce Strategy Group.

14.2 The position of Co-Chair(s) of the EDIG will be reviewed at least every three years.

## APPENDIX IV - STAFF GROUP TOR EXAMPLE

Our Staff Equality Networks aim to give our people a voice in the organisation with the intention to improve experience and outcomes across the employee journey.

The events combine a sprinkle of academic research and our organisational values to offer you a fresh and exciting way to promote inclusion and celebrate diversity. The Council embraces the Equality Act 2010 and aims to demonstrate due regard to promote equal opportunity, eliminate unlawful discrimination and foster good relations.

By raising the profile of diversity and inclusion, recognising that everyone is unique, we can ensure that we are responsive to the needs of our diverse population and inspire a culture of respect for all our people. The Council recognises the importance of the Human Rights Act and aims to inspire a culture based on Freedom, Respect, Equality, Dignity and Autonomy.

### Equality Networks Represented

1. Staff
2. Staff
3. Staff
4. Staff

### Why do we have Staff Networks?

The Council demonstrates its commitment to diversity and inclusion as a service provider and employer by putting our residents and people first, working in partnership and treating everyone with respect. Our commitment to diversity and inclusion is extended to the following:

- The workforce is supported to remain healthy, with a focus on addressing major health and lifestyle issues that affect individual staff and the wider population;
- Cabinet and senior leaders conduct and plan their business so that equality is advanced, and good relations fostered, within their organisations and beyond;
- Middle managers and other line managers support and motivate their staff to work in culturally capable ways within a work environment free from discrimination;
- Improved communication to more effectively engage with staff to promote delivery of the staff wellbeing and diversity and inclusion plan; and
- Maintain and strengthen legal, regulatory and commissioner compliance for diversity and inclusion and demonstrate our capability to understand and meet the needs of our residents and people.

### Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is a toolkit that aims to improve our diversity and inclusion performance.....

Performance is measured through a wide range of key performance indicators including the Annual Equality Action Plans, Staff Survey and our annual Diversity Scorecard.

### Responsibilities of the network Co-Chairs

- Set the Agenda for the meeting of the group they are chairing
- Plan and run meetings in accordance to the TOR.
- To bring impartiality and objectivity to meetings and decision making
- Ensure that the meetings are held Quarterly, and actions assigned appropriately
- Finalise the sign off minutes of meetings
- Promote the networks and ensure membership of the group from all services

- To be aware of current issues that may affect the network.



**FOR MORE INFORMATION:**

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The matters raised in this report are only those which came to our attention during the course of our audit and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. The report has been prepared solely for the management of the organisation and should not be quoted in whole or in part without our prior written consent. BDO LLP neither owes nor accepts any duty to any third party whether in contract or in tort and shall not be liable, in respect of any loss, damage or expense which is caused by their reliance on this report.

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