

South Gloucestershire Council
Equality Mark Level 3
Assessment and Validation

September 2008

Assessors

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1. Introduction

The following report is based on the findings of an assessment and validation carried out for South Gloucestershire Council (the Council) to examine their claim to have achieved Level 3 of the Equality Standard for Local Government (BVPI 2a). The assessors conclude that Level 3 has been robustly achieved and the authority has put in place systems that can support continuing improvement in the development of equality management. We particularly point to young people being included on interview panels within CYP, respect from the voluntary and external sector, the wide range and number of example EIAs referred to by individuals during interviews e. However, the findings also suggest some areas will need to be addressed in order to consolidate this achievement at Level 3 and maintain a continuous equality improvement process.

The report has two purposes. The first is to provide a formal assessment against the elements of Level 3 of the Standard. The report, therefore, sets out the methodology used in the assessment and presents the findings of the assessors in relation to Level 3 of the Standard. The second is to provide qualitative comments and recommendations; to provide critical support for future improvement in equality policy and practice and the maintenance of a well established equality improvement process. The report provides a brief discussion of the assessment methodology followed by a review of the Council, focusing on the documentary review of corporate policies, reports and recent inspections and assessments. Section 4 comments on Level 1 and Level 2 achievement. Section 5 confirms achievement at Levels 1 and 2. Section 6 contains the formal assessment for Level 3 and Section 7 identifies a number of areas for review in the next phase of equality improvement.

2. Methodology

The formal assessment consists of three interrelated parts:

- Critical examination of the Council's equality self-assessment and a sample from a portfolio of documents supplied by the Council
- Interviews with Elected Members, Council staff and external stakeholders to test the self assessment, corporately and by department
- Examination of documentary evidence for consistency with self-assessment and interview findings

Conclusions about the level reached are arrived at through qualitative examination of findings from the three parts of the assessment.

2.1 Achieving Level 3 of the Equality Standard for Local Government

To achieve Level 3 of the Standard, a Council has to show that each service area has developed equality service objectives and set out targets and related performance indicators to achieve those objectives. A Council will also have reviewed its employment, human resource, pay and 'service delivery' practices. This will enable a Council to set realistic employment and pay targets.

Objects and targets should be based on equality impact assessments defined by a prior screening/prioritisation process. Equality impact assessments should be shaped by good quality data collection, stakeholder input and the results of existing or specifically commissioned consultations.

A Council should show that it has developed the capacity to consistently monitor action taken to achieve equality objectives and targets. It should be able to demonstrate that it has undertaken sufficient consultation both internally and externally to be able to understand the needs of all its stakeholder groups.

Finally, a Council should be able to show that equality improvement action (i.e. action to achieve targets) has actually started.

2.2 Formal assessment at Level 3

A numerical rating system is used in the formal assessment to support findings for each element of Level 3 of the Standard. The scoring system is straight forward and is consistent with the approach taken by the Audit Commission in Best Value Reviews and Assessments. Scores are 4,3,2,1 with 4 being highest and 1 being lowest – a score of 0 would indicate a serious weakness or other lack of evidence. The scores summarise a **qualitative** judgement of the Council's performance in relation to that element. To achieve Level 3, a Council should get an average score of 3 with no elements scored a 1 or 0.

The quantitative part of the assessment assigns a Council-wide score to each of the Level 3 elements.

- Good performance = 4
- Strengths outweigh weaknesses = 3
- Weaknesses outweigh strengths = 2
- Poor = 1
- No evidence for performance = 0

The assessors conclude that the Council has met this criterion. The scores assigned have taken into account the contents of the self-assessment document,

documentary evidence and results of interviews with managers, other staff and stakeholders

3. Context

3.1 South Gloucestershire: the area

The Council covers an area stretching from the river Severn in the west, to the Cotswolds in the east. Its southern area borders Bristol along the Avon and reaches almost to Bath; thus it is at the end of the M4 corridor and includes the major junction with the M5. Both the English sides of the two Severn bridges are in the Council area. The Council, which was formed after the break up of the Avon authority, has no single town centre, with Yate, Chipping Sodbury and Thornbury being the main towns.

60% of the Authority's total population lives in the built up areas immediately adjoining Bristol, with 20% in the three main towns of Yate, Chipping Sodbury and Thornbury. South Gloucestershire is relatively affluent, with some hidden pockets of deprivation at sub ward level.

The census of 2001 recorded a population of 245641, but the area has been one of the fastest growing in the country; since 1991 there have been over 30,000 new jobs and 18,00 new homes. By 2011 it is expected that the number of households will increase by over 7,000 to 111,000 with the number of over 65s increasing by 24%. The number of 15- 24 year olds will also increase to 38,000. The 2001 census recorded 14% of the population as having a limiting life long illness. The ethnic composition in 2001 was 96% white British, with the 2.4% black and minority ethnic population being, in descending order of numbers: Asian, Mixed White and Black Caribbean, Chinese, and Black Caribbean.

Since the census Somali refugee people have arrived in the area and, in common with many parts of the country Eastern European, particularly Polish people have arrived in significant numbers, to join a longer established Polish community.

3.2 South Gloucestershire Council

South Gloucestershire Council has adopted the Cabinet and Executive Style of leadership (which is made up of the Leader and the Cabinet). South Gloucestershire Council is made up of 70 elected Councillors, elected every four years. Since the last election (3rd May 2007), the political balance is as follows:

- 34 Conservative Councillors

- 27 Liberal Democrat Councillors
- 9 Labour Councillors

The Councils' management structure consists of a Chief Executive, five Directors plus the Head of Safer South Gloucestershire. There are five departments through which the Council delivers management of all corporate and service delivery functions

- Chief Executives and Corporate Resources
- Children and Young People
- Community Care and Housing
- Community Services
- Planning Transportation and Strategic Environment

Overview and scrutiny is undertaken by six 'select committees' and there are five area forums

3.3 External Reports

In the Comprehensive Performance Assessment of 2006, the Council obtained three stars and is seen as improving well.

The Inspection report on Strategic Housing in January 2008 also accorded two stars with promising prospects for improvement.

The Audit Commission school survey rated the effectiveness of support for meeting the needs of black and minority ethnic, refugees and travelers as being good and above the average for Councils. Ofsted also recognised that St Paul's primary school was "determinedly inclusive".

4. South Gloucestershire Council: Equality Policy Framework and Approach

4.1 Policy and structure

South Gloucestershire has developed a Corporate Plan for 2007-2010 focusing on key priorities for the next three years in order to achieve their part of the Community Strategy. The plan sets out the Council's ambitions and priorities under a set of improvement priorities, these are:

- Strengthening our communities
- Meeting the needs of and providing opportunities for our children and young people

- Understanding and meeting the aspirations of our older people
- Improving and managing travel and transport
- Reshaping our housing services
- To ensure that we are a well-managed Council ¹

Overall the Corporate Plan does align with the Equality Standard for Local Government.

Just prior to the assessment a new plan was produced.

The plan contains seven corporate aims to meet this vision. These are:

1. Investing in children and young people
2. Improving health, modernising community care and health services
3. Managing future development
4. Promoting safer and stronger communities
5. Valuing the environment
6. Maintaining economic prosperity
7. Ensuring we are “Fit for our Future” – the council’s improvement programme

South Gloucestershire’s Equality Strategy (2006-2010) incorporates the Race, Gender and Disability equality schemes (although there are separately documented equality schemes available for each category), and refers to the six ‘equality strands’ of age, disability, gender (and transgender), race, religion and faith, and sexual orientation. It identifies key outcomes for employees, customers and residents, and sets out the Council’s approach to implementing the Equality Standard for Local Government, and sets out its broad corporate priorities across the six strands for the next three years.

The Council’s approach to managing equalities has largely taken place through:

¹ Following the assessment interviews South Gloucester adopted a new Council Plan with revised corporate aims:

1. Investing in children and young people
2. Improving health, modernising community care and health services
3. Managing future development
4. Promoting safer and stronger communities
5. Valuing the environment
6. Maintaining economic prosperity
7. Ensuring we are “Fit for our Future” – the council’s improvement programme

- Putting in place a robust impact assessment model
- Carrying out consultation events with stakeholder groups representing the 'six equality' strands –race and faith (Black and Minority Ethnic/faith community representatives), gender (women), disability, age (older people), sexual orientation (Lesbian, Gay and Bisexual)
- Incorporating mainstream review and progress monitoring of progress through its PB Views reporting system and PDPR staff appraisal

Responsibility for equality sits within Community Services. Department There are three part-time equalities officers, who reports to the Head of Communities. There is currently a member Equalities Champion who committed to equality improvement. There is a strong Equality and Diversity Action Team EDAT; there are also departmental Equality Working Groups. EDAT is chaired by the Director of Community Services who is the senior lead officer for equalities within the authority.

EDAT and the three officers support equality management across the organisation through:

- Providing the corporate lead on developing the resources, providing advice and assistance, in order to ensure the implementation of the equality standard
- Developing the Equality Strategy
- Developing and monitoring equality targets corporately and across the authority
- Carrying out community support and consultations with a range of stakeholders and elected Members
- Equalities progress is monitored and measured, by the team, through service improvement reports and through Best Value performance Indicators.

E & D is embedded into all areas; policies are reviewed and EIAs are carried out and cascaded down. It is structured and robust; it doesn't feel like an add on. There is practical engagement across the range of services, which has allowed the Council to refocus service delivery where necessary.

4.2 South Gloucestershire Council's Approach to Equality Improvement and the Standard

South Gloucester has developed a robust and well-managed approach to equality improvement. There are many examples of good equality improvement practice to be found in its work. Elected members are giving a strong lead and are well informed. During interviews staff showed themselves to be knowledgeable about and committed to working with the Equality Standard.

The Council presented a good range of documents in support of its claim to be working at level 3 of the Equality Standard.

a) Equality impact assessment

The Authority has a well-established set of processes for choosing what to impact assess and for completing assessments. Doing equality impact assessments was previously seen as more of a tick box exercise; people were resistant to doing them and could not see why they should be done. The process was changed and:

“The penny dropped and now people see the point of it. People can see that concrete actions arise... The change cut through a mist; people do them at the lowest appropriate level. They are signed off by divisional equality teams and go into departmental operations plans.”(Interview)

This process knits EIAs into the operational plans and performance management process. The Council reports that it is up to date on the rolling programme, with 100% of EIAs being complete. Finance and property list eleven completed EIAs. They report that they include as many people as possible in doing the assessment, so they don't make assumptions

We saw examples of good EIAs leading to the development of clear equality objectives. For example, the EIA on adult day services; identified the need for single sex access to services. Meals for the elderly changed from a one size fits all to a locally produced and varied product. EIA reports on the whole indicate a fair attempt but the approach does need some revision and not be so template focused. (see recommendations section)

b) Self-assessment

The Council produced a good and clear self-assessment document that provided the background and approach to equalities that the Council had taken.

Whilst this document provided a good range of information, there are aspects of it which are too vague and aspirational. “To aim for excellence” “To engage stakeholders” do not constitute well-defined equality objectives with SMART targets. These are needed so that concrete activities can be assessed.

In other places the self-assessment made very broad statements, which were not adequately evidenced. The document would have benefited from a more explicit recognition of areas for improvement across the board.

c) Performance management

There is a clear link with the performance management system through the PB Views reports and the PDPR process.

5. Achievement at Levels 1 & 2

5.1 Formal Assessment for Level 1

During the Level 3 assessment, the Council can demonstrate it had met the criteria for Level 1 by:

- Compliance with all relevant legislation
- Improving equality practice at both corporate and departmental level
- Demonstrating a shared understanding of the Comprehensive Equality
- Policy to underpin commitment
- Earmarking specific resources for improving equality practice
- Equality action planning and equality target setting within all departments and service areas
- Systematic involvement of stakeholders
- A fair employment and equal pay policy
- Carrying out impact assessments
- Progress monitoring
- Audit and scrutiny

5.2 Formal Assessment for Level 2

During the level 3 assessments, the Council can demonstrate it had met Level 2.

It has engaged with carrying out impact assessments, and completed a self assessment, including identifying the key issues and barriers that were identified

- That it has developed systems for self-assessment, scrutiny and audit as
- the basis for continuous improvement
- That it has engaged in equality impact assessment
- That it has undertaken self-assessment across the authority
- That it has involved designated community, staff and stakeholder groups
- in service planning
- That it has engaged in the development of information and monitoring
- systems
- That it has engaged in an equality action planning process for
- employment, pay and service delivery

6. Formal Assessment for Level 3 of the Equality Standard

6.1 Evidence

For achievement of Level 3 of The Equality Standard for Local Government a Council is required to have met the following criteria:

- That it has implemented a strategy for participation of designated community, staff and stakeholder groups in setting objectives for employment and service delivery
- That it has set equality objectives across the authority for race, gender and disability for employment, pay and service delivery based on impact assessments and participation strategy
- By March 2009 it has set equality objectives across the authority for
 - sexual orientation, age, religion or belief for employment, pay and
 - service delivery based on impact assessment and participation strategy
- That equality objectives have been translated into action plans with
 - specific targets
 - That it is developing information and monitoring systems that allow it to
 - assess progress in achieving targets
 - That action on achieving targets has started
- Progress has been verified through self-assessment and scrutiny and has been validated externally through an accredited assessor

- These general activities and developments translate into action in the four substantive areas of the Standard:
 - Leadership and Corporate Commitment
 - Consultation, Community Involvement, Engagement, and Scrutiny
 - Service Delivery and Customer Care
 - Employment and Training

The Council produced self-assessment documentation detailing the level 3 items to be assessed. Documentation is in itself an important indication of a comprehensive and systematic approach to the self-assessment process and to the achievement of level 3 of the Equality Standard. One of the principal functions of the detailed interviews was to confirm whether the self-assessment reflected what is happening at a service level. This was found to be the case.

Where specific examples of good practice are referenced in the report this simply reflects the areas sampled for documentary review and staff interview. It is not meant to imply that good practice does not exist in other parts of the Council.

6.2 Achieving Level 3

It is the judgement of the assessors, having taken into account the evidence collated from the focus groups, interviews, documentation supplied and meetings held with managers, that a framework for service based self assessment has been put in place, and the Council is working at Level 3 of the Standard. However, there are areas where the Council will need to make improvements in order to consolidate the gains so far made, and to provide a strong base from which continued progression towards levels 4 and 5 of the standard can be sustained.

The rest of the assessment report is therefore structured in the following way:

1. An examination of the evidence against each of the substantive areas of the Equality Standard. We have set out in summary format where South Gloucestershire Council has met the requirements
2. We have identified the areas for improvement under each of the headings
3. We have included comments and recommendations arising from the individual interviews and/or focus groups where we felt that this added value to the summary and each area of improvement
4. A score of between 1 - 4 is given after each summary, for all of the substantive areas of the Equality Standard

LEADERSHIP AND CORPORATE COMMITMENT

Ensure consistency of Corporate Equality Scheme with statutory equality schemes

The Council can demonstrate:

- Its equality policy and corporate equality and diversity action plan cuts across all the three statutory strands
- All schemes are in place; the RES was recently revised and reviewed by an independent consultant who produced a useful and detailed commentary.
- The GES does refer to some specific gendered outcomes and staffing issues (such as increasing the number of men working in education and childcare) women's health initiatives, activities around International

Women's Day. There is also a focus on promoting physical activity apart from traditional competitive team sport

Areas for review and improvement:

- The Gender strand and scheme is a weak leg of the triangle; whilst for example the Local Transport Plan recognizes that women have lower car use there is a lack of concrete actions to address this, apart from further consultation.

SCORE 3

Develop a system and timetable for reporting the results of impact assessments

The Council can demonstrate:

- It has a robust programme and timetable for impact assessments
- It has developed corporate information, guidance for conducting equality impact assessments
- All assessments are reported through departmental equality and diversity action teams and up through the corporate EDAT
- 100% of the initial programme of assessments is complete.
- There are some excellent thoughtful EIAs, such as the initial part of the Benefits EIA, and the recruitment EIA
- The quality of the assessments is on the whole good, with some exceptions

Areas for review and improvement:

- There is some variation in the quality and consistency of impact assessments, A few impact assessments skate over the possibilities that diverse groups may find it harder to access the service. (for example, the EIA on the project to review corporate feedback and complaints fails to recognize that some groups may find it harder to complain) or the EIA on the LAA says there are no adverse impacts, whereas it is not probable that the needs of all sections of the community are met by the LAA, when (it is reported) gender is not considered as a variable
- It is evident that the question on monitoring has not been understood by some people and the guidance on this point could be improved di check guidance

- Some EIAs use formulas to obviate or defer consideration of potential for adverse impact, “This is a statutory service” (One stop shop, or Cashiers) or (obscurely) that the matter “will be considered with any changes to policy as a result of satisfaction drivers being identified” (Customer satisfaction research or Ombudsman procedure).
- The template is not clear in what it is expecting in the question on monitoring, oriented more to tracking progress than on ensuring that diverse groups have equal access to services or are equally satisfied. The question on consultation does not oblige EIA teams to search out the latest information nor to commission new work if necessary.
- The template also asks if there is adverse impact on the grounds of race or ethnicity. It is unclear if the separate box for “gypsies and travelers” is supposed to suggest that they are not an ethnic group.
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SCORE 3

All departments and service areas set targets based on equality objectives devised through completed impact assessments and participation of designated community, staff and stakeholder groups

The Council can demonstrate that:

- They have a systematic approach to equality action plans
- Departments, such as Environmental Services have targets in place for all service areas.
- Departments, such as Chief Execs and Corporate Resources ran 2 day away days to draw up their equalities action plan
- The HR team plan establishes that it is working to the 2008 LAA equality targets, is increasing work placements for disabled people and has met targets for the Disability confident workshop programme.
- There are departmental diversity and equality intranet sites
- There is an explicit linkage between the equality action planning process that the Council has adopted and its strategic plans.

Areas for review and improvement:

- Many of the objectives are of the “raise awareness” type and relate to outputs and not outcomes.
- Too many “actions’ are really objectives or parts of a “wish list”

SCORE 3

Equality objectives and targets for sexual orientation, age, religion and belief to be set by March 2009

Not currently assessed

Establish corporate guidelines for information gathering and equality monitoring

The Council can demonstrate that:

- Equalities monitoring guidance refers more clearly to recruitment
- Equalities Monitoring is used in their customer service satisfaction surveys in some departments, for example Development Services
- Development services have an action point to analyse planning applications and enforcement actions taken re minority groups such as travelers

Areas for review and Improvement:

- There are no detailed corporate guidelines on monitoring
- There are some good examples of equality data collection. These examples, however do not yet amount to monitoring against the achievement of objectives nor the meeting or targets
- Equalities monitoring is not yet routine, for example Highways & Transportation were only giving “consideration of inclusion of ethnicity questionnaire as part of consultation process”

SCORE 2

Seek agreement on equality targets with designated community stakeholders and local partners

The Council can demonstrate:

- Equality forum meeting minutes indicates discussion of equality targets.
- Good level of engagement indicated by evidence
- It has involved a range of partners including from the Police and PCT/ Health sectors, during the consultation events with stakeholder groups
- It is working with a range of partners, for example, 840 participants commenting (including on equalities) on the Local Development framework
- The South Gloucestershire Strategic Partnership (LSP) supports the Council in meeting it's objectives for community development and service planning
- Senior officers are represented at external equalities groups
- The citizen's panel "Viewpoint" has been refreshed to have a greater voice for BME people
- The Council has an SLA with the Black Development Agency to strengthen the voice of local BME people

Areas for review and improvement

- Whilst we acknowledge that the Council engages in consultation with community and equality groups, it is not clear what level of critical challenge or scrutiny, particularly with regard to work on the Equality Standard and impact assessments this provides.
- There is an under mention of gender equality issues (for example the LSP, apparently doesn't consider this as a variable)
- The Gender Equality Scheme does not make clear how women and men were consulted
- The "Customer segmentation" approach should be reviewed or impact assessed to determine whether it provides a sufficient focus on gender equality

SCORE	3
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Establish mechanisms for ensuring that equality targets are delivered by contractors through contract management

The Council can demonstrate:

- It has systems in place for requiring that all external contractors meet well defined employment and service delivery race equality criteria
- Guidance for suppliers and contractors sets out the Councils equality policy in general

Areas for review and improvement:

- The guidance reminds contractors to review documents such as the Council's Equality policy and Race equality scheme; it does not refer to the Disability or Gender Equality schemes.
- The contract conditions similarly contain clauses, which only refer to race equality.
- There is reference to breaches of equality law, being potentially grounds for exclusion, but there is no reference to the law on gender here.
- The Council's monitoring and evaluation process needs to show the effectiveness of the policies that it has set in place, and to show the extent to which equality targets or considerations are being adhered to by suppliers and contractors
- Clarification of circumstances in which non-compliance with the Council's policy will lead to cessation of trading or contract termination is required

SCORE	2/3
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Ensure completion of equality action plans at departmental and service level incorporating performance indicators:

The Council can demonstrate:

- It has in place mechanisms that support the development of equality action plans at Corporate, Departmental and service level
- EDAT takes an overviewing role in the review of service plans, on a regular basis
- The more detailed reviews are conducted by individual DMTs (Departmental Management Teams) and the EWGs (Departmental Equality Working Groups) That it has incorporated service specific and best value performance indicators into service planning divisional Operational service plan
- It has a robust system for performance management and reporting through the PB Views quarterly reports
- There are a high percentage of key PIs in the top quartile of performance

Areas for review and improvement:

- The Council has set out to cover all six equality strands (race, gender, disability, age, religion & belief and sexuality). However, the approach to these six strands is not even, when we looked at evidence beyond the corporate ambitions. There is a much stronger emphasis on race and disability. The area of gender (a legal positive duty) is often under mentioned

- Work on religion/belief through “Faith net” does not include non theistic beliefs
- The Council should address the inconsistencies that are apparent, particularly at service planning level.
- There are some outcome oriented objectives and some “actions” that are not actions at all

SCORE 3

Adopt where appropriate national targets/performance indicators as prescribed by government departments or by the Audit Commission:

The Council demonstrated:

- Annual performance report details performance and separate report gives returns for BVPIs.
- Other indicators/objectives can be found in specific equality plans
- That it has adopted national targets where appropriate
- National performance indicators are being used to measure progress
- It is continuing to use the equality BVPIs that are no longer indicators
- It has picked up some PSAs which are relevant to the equality agenda, for example PSA 141 the number of vulnerable adults achieving independent living and PSA 145 the number of people with learning difficulties in settled accommodation

Areas for review and improvement:

- None identified

SCORE 4

Implement systems for reviewing progress and revising the Corporate Equality Scheme and departmental action plans

The Council can demonstrate that:

- It has a robust system for performance management through the PB Views

- The EDAT, carries out a regular review of service plans
- The Council has the procedures in place to enable it to carry out regular reviews of all service level and equality action plans
- The EDAT has a remit for reviewing progress
- The assessors are confident that the Council has the structures in place to continuously review progress and revise its plans.
- Development Services (and others) point out that equality action plans are built into the Operations/ Service Planning and progress reviewed through PB views.

Areas for review and improvement:

- None identified

SCORE 4

Members and senior officers to endorse action plans as appropriate

The Council demonstrated:

- That senior management is actively involved in the development and support of equality action plans
- That Members are aware of and fully support equality plans
- Interviews with senior managers and members support the documentary evidence
- That there is a senior officer with a direct lead for equalities
- There are detailed reports to select committee on ESLG.

Areas for review and improvement

- The Council needs to build on the progress so far made with the leadership of equalities
- Ensure that equal/improved weighting is given to all areas of equality/interest groups/stakeholders (for example, there is a stronger emphasis on Race/BME and Disability issues than on other areas such as Gender/Age/Lesbian, Gay, Bisexual and Transgender , Religion and Belief
- Seek and establish ways of raising awareness and training on areas of equalities not so well covered
- Create opportunities for more training and awareness sessions for all staff
- Continue work with Members to ensure they understand and are confident with all aspects of the equalities agenda, including work with gypsies and travelers

Score 3/4

Link action planning to performance management and Best Value processes
The Council can demonstrate that:

The Council can demonstrate:

- Service plans and planning guidance presented indicates appropriate cross linkages
- It has a robust performance management process
- Equalities are not an add on, but are integrated into the main stream
- The PB views process, including regular reports integrate equalities
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Areas for review and improvement

None identified

SCORE 4

Ensure that action on achieving targets has started

The Council can demonstrate:

- It has the structures in place that allows it to set equality objectives and targets that is supported by an evidence based framework
- Sets of minutes indicate where action has started
- Timescales have been attached to targets
- Reports from service areas show that action has started

Areas for review and improvement

- None identified

SCORE 4

CONSULTATION AND COMMUNITY DEVELOPMENT AND SCRUTINY

Develop a strategy for all designated community, staff and stakeholder groups to participate in the development of equality objectives, service design and employment practice

The Council can demonstrate that:

- It has improved practice through its part time equalities officer who focuses on community consultation
- Council plan and community strategy have defined equality objectives. Good range of partnership documentation with specific equality objectives/content built in. Community groups speak positively about their engagement with the Council
- The Council's equality schemes are available on the Council's website
- It has placed information relating equality action plans on the website
- It has engaged in a range of consultation exercises to inform its equality strategy
- It has promoted equality through a wide range of events such as the "Engage Festival"

Areas for review and improvement:

- It needs to publish equality impact assessments on the internet so they can be clearly located
- Support initiatives that develop improved communication with specific groups, covering all the 'six equality strands'

SCORE	3
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Make all service level and employment objectives and targets available for consultation and scrutiny

The Council can demonstrate that:

- Objectives for employment are made clear in the Employment Report.
- Website pages ask for comments on plans. Not clear whether departmental action plans are available.
- LSP work programme shows discussion of equality issues

Areas for improvement and review

- Need to check on effectiveness of external scrutiny and what kind and level of response.

SCORE	2/ 3
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Make provision of language services appropriate to designated consultation and scrutiny groups

The Council demonstrated:

- It provides signposting in a wide variety of community languages on its publications
- That it has appropriate language and translation services available during consultation
- It has taken steps to understand which are the most frequently used languages and a signposting statement is made in 13 community languages
- Staff and customers are made aware of the existence of language line via articles on Equalities on the web
- It has taken into account access needs of disabled people and provides appropriate support – for example, Braille, BSL facility
- That it makes good use of (some) community groups e.g. Polish and Somali and networks to provide language and other support

Areas for review and improvement

- Hearing loops and other disabled facilities need to be regularly checked for consistent functioning
- The Council needs to demonstrate; through monitoring and effective evaluation how well its language and support mechanisms are meeting the needs of its communities/service users.

SCORE	4
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Consultation is systematically built into equality impact assessment, self-assessment and the equality planning process

The Council can demonstrate:

- Staff and stakeholder groups have been consulted in the development of Council priorities
- Consultation results have provided a resource for developing the Equality Strategy and other strategic documents
- Evidence from CYP and Strategic Housing shows systematic consultation and involvement

Areas for review and improvement

- The “Knowing Our Customers” document should be reviewed and if necessary impact assessed to determine whether it pays sufficient attention to gender specific needs

SCORE	3
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Involve designated community, staff and stakeholder groups with scrutiny procedures

- It has consulted with a range of local groups on the way in which it will open itself to scrutiny.
- Wide range of forum and other minutes presented that suggest a good degree of involvement.
- The Council carries out regular consultation with staff and staff groups
- Progress on equality issues is regularly reported through the Councils democratic processes

Areas for review and improvement:

- Although the Council has engaged well with a range of groups, there is a perception that some groups (such as gay men and lesbians or non theistic believers may not be as fully involved).
- It is not clear to what extent the involvement leads to comment and feedback on the policies

- External stakeholders need to clearly and regularly know about the findings of impact assessments, the contents of action plans, why specific improvement targets have been set and how they will be monitored

SCORE	3
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Consultation on equality to be linked with the continuing development of community strategies

The Council can demonstrate:

- Consultation on equality is linked to the development of the Council's Equality Strategy, strategic plans and equality plans
- Meeting based consultation took place (detailed on the web page and in partnership documentation)
- Specific events were organised to target priority groups (for example, older people, young people the Engage festival)

Areas for review and improvement

- Gender needs to be a much clearer focus for the LSP

SCORE	3/4
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Publicise how, when and where actions on targets will start:

The Council can demonstrate:

- It has in place action plans that are made available to the public
- Corporate equality action plan exists with dates
- It has in place equality action plans, and equality schemes with defined targets, timescales and officer responsibilities, and that it has made this information publicly available

- It provides information both on the web and via the notice board at Nibley court.

Areas for review and improvement

- Make sure that all stakeholder groups are kept abreast of actions.

SCORE 4

SERVICE DELIVERY AND CUSTOMER CARE

Equality objectives and targets developed within each department/service area for race, gender and disability based on completed impact assessments

The Council can demonstrate:

- Systematic approach to equality action plans.
- There are number of good outcome oriented objectives
- It has a robust programme and timetable for impact assessments
- 100% of the initial programme of assessments is complete

Areas for review and improvement

- Many of the objectives are of the “raise awareness” type and also relate to outputs and not outcomes
- The area of gender is barely included in action plans

Score 3

Equality objectives and targets developed within each department/service area for sexual orientation, religion and belief and age by March 2009

- Not currently assessed

Service plans to specifically address the importance of barriers, accessibility and reasonable adjustment in the provision of services

The Council can demonstrate:

- It states that accessible buildings are used for community consultation
- There has been consultation with disabled service user groups, for example with learning disabled people using day centres
- Over 50s have been consulted on quality of life issues,
- The Equality Strategy and the DES makes a range of equality commitments to disabled people
- Equality impact assessments have taken into account issues of accessibility
- There is an Access and Inclusion Plan
- Service level equality actions plans have incorporated the principle of reasonable adjustment
- There is 'accessible services' guidance available for service delivery staff
- The Engage festival celebrating cultural freedom had the aim of removing barriers and prejudice and was attended by 3800 people.

Areas for review and improvement

- Hearing loops and other disabled facilities need to be regularly checked for consistent functioning

Score 4

Allocation of appropriate resources to achieve targets

The Council can demonstrate:

- Service delivery staff have received training resources for equality improvement work
- Staff time has been allocated to equality improvement work
- Black and Minority Ethnic and Disabled Staff Groups have been established to support consultation Equality action planning is part of the overall service planning process
- There is a Corporate Equalities and Diversity Action Team EDAT

- Resources for dedicated equalities staff are to be increased to a 4 day a week and a 3 day a week post together with the part time Access Officer
- The EDAT has members in all service areas that ensure linkage to all service and equality action plans
- The EDAT receives support and direction from senior management group and the member equalities champion
- The staff time for the departmental equalities working groups is an important resource

Areas for review and improvement

- The Council should ensure that all equality objectives and targets are explicitly and adequately resourced
- The Council should make clear the process for filling the equality posts and inform the community of this
- Consideration should be given to the issue of staff groups on other diversity strands, e.g. gender

Score	4
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Set timetable within action plans for creating/adapting information and monitoring systems within service areas

The Council can demonstrate:

- It has begun to train managers in monitoring techniques
- A specific monitoring sub-group of the EDAT has been created to support work to Level 4 of ESLG

Areas for review and improvement

- Production of corporate monitoring guidance
- Adoption of consistent monitoring practice at service and team level
- It should extend the remit of the monitoring sub-group to supporting the development of effective target monitoring within service areas as well as employment
- It should ensure that training for equality monitoring (as opposed to data collection) proceeds quickly

Score	2
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For agencies delivering services on behalf of the local authority, include within contracts a requirement to deliver an effective and appropriate service, fairly and without unlawful discrimination

The Council can demonstrate:

- It aims to have contractors and suppliers working to its own stated equalities objectives
- Its *Equalities in Procurement* contains guidance on equal opportunities
- Organisation tendering for work are required to submit details of their equality policies and procedures
- It has produced a detailed equality compliance questionnaire for suppliers
- Partnerships with consultants in Highways & Transportation required knowledge of the partners' equality statement

Areas for improvement and review

- It is not clear that all organisations tendering for contracts will be required to complete the equality and diversity questionnaire or whether the requirement is limited to contracts above a certain value
- The procurement guidance is race focused, for example it refers to contractors being required to inform if they have had cases of race discrimination taken against them and not of gender or other grounds

Score	2/3
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Establish monitoring of contracts to secure equal employment and equal service delivery targets

The Council can demonstrate:

- It intends to equality monitor the performance of suppliers and contractors

Areas for review and improvement:

- There is no clear evidence of how compliance with the Council's equality requirements will be monitored

- The Council should develop a system for the equalities monitoring of contracts

Score	2
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Start action on departmental and service area targets:

The Council can demonstrate:

- It has the capacity to coordinate and report on equality action towards targets
- The self-assessment document indicates that equality improvement action has started across all departments
- There is a good range of plans with time scales and achievements recorded
- PB Views check and monitor progress against targets

Areas for review and improvement:

- None identified

Score	4
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EMPLOYMENT AND TRAINING

Set employment equality targets for recruitment, staff retention, work force profiles for race, gender and disability

The Council can demonstrate that:

- The Equality Strategy contains equal employment commitments across disability, gender and race and ethnicity with targets
- The Council equality schemes contain employment commitments and employment improvement actions
- Strong on plans for improving disabled employment

- There are guarantees for disabled employees and applicants in the DES
- There is an HR team plan that covers recruitment, employment policy and procedure and training
- It recognizes that both BME and disabled people are underrepresented in its workforce. (The percentage of Council employees who are from a black or minority ethnic background is 0.5% as compared with a percentage within the population of South Gloucestershire of 1.6%; the percentage of disabled staff is below 1%).
- It has well-defined targets for applications and recruitment from BME and disabled people (increase to 1.5% BME staff by 2008 and for disabled staff to 1.65%)
- A range of initiatives are being pursued to increase both BME and Disabled employment (for example, allocating a number of work experience placements within the Council to members of the community from under represented areas; establishing closer links with community groups; offering pre-employment training to under represented areas of the community, covering areas such as how to complete an application form and interview techniques; continuing to develop further work life balance initiatives.
- Human Resource services intends to promote the 'Access to Work' scheme more widely, and to provide all recruitment information in other formats such as text, to make them more accessible for people with learning disabilities.
- It has a positive action social work traineeship

Areas for review and improvement:

- It recognises the imbalance between the high proportion of women that it employs and proportion of women in higher paid Council jobs and intends to increase the number of women in the top 5% salary group

Score	4
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Set employment equality targets for work force profiles for sexual orientation, religion or belief and age according to available data

- Not currently assessed

Conduct an equal pay review and plan for equal pay adjustment

The Council can demonstrate:

- It has developed “a reward strategy incorporating pay, terms and conditions of employment and other employee benefits which employees believe give fair reward for their contribution to the Council’s success”.
- Its job evaluation and pay review has been conducted in full consultation with the relevant trade unions
- It has produced a report showing no significant gender pay imbalances
- Equal pay adjustment has been planned for

Areas for review and improvement:

- The Council has done some good research on the implementation of its equal pay scheme should plan to equality impact assess the new pay structures to determine what effect they have had on BME and Disabled staff.

Score	4
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Establish that policies and procedures associated with equality are part of staff handbook and are understood by staff

The Council can demonstrate:

- Equality is included in the Personnel handbook
- All employees are given the handbook at induction, the intranet
- A-Z, which holds all policies.
- Staff documentation contains appropriate content
- Staff have received equality training
- Equalities are part of the regular PDPR staff review process, where understanding is checked
- There is a 360 degree feedback process whereby staff can feed back to managers on all matters, including equalities

- In Housing the induction report on new starters checks their understanding on equalities

Areas for review and improvement:

- None identified

Score	4
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Establish a system of guidance and training on relevant equality issues to short- listing panels and interviewers

- There is both guidance and training for those involved with recruitment
- There is specific guidance for employing disabled people

Areas for review and improvement:

- It would be useful to have specific equality guidance covering all potential issues for those involved in short-listing and interviewing

Score	3
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Ensure that staff and members are aware of actions plans and the implications for services and employment

The Council can demonstrate:

- It has well developed means of internal communication
- There are regular updates on equality developments
- Equality and diversity training has taken place
- The Workforce Plan has been produced in a user friendly format
- Regular bulletins have been produced to update staff on the progress of job evaluation and pay review
- The Customer Care service has distributed “Think Equality” bugs to its staff
- Equalities are part of the regular PDPR staff review process, where understanding is checked
- The EDAT and DWG structures mean that equalities is well imbedded and cascaded in service departments
- Action on equality is palpably underway

Areas for review and improvement:

- None identified

Score	4
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Provide training for managers on the implementation of the standard with contractors and partners

The Council can demonstrate

- There are contracting guidelines for managers
- Commissioning SLAs with partners such as “Safer South Gloucester shire” includes equality requirements
- Staff attended the Lift South West training, on equalities and procurement

Areas for review and improvement:

- Not clear what detailed equality in procurement training has actually be carried out
- The procurement guidelines do not cover areas other than race in any detail; for example there is no reference to the consequences for contractors if they have court judgments against them for sex or disability discrimination and guidelines refer to the Race Relations Amendment Act and not to the other duties to promote gender and disability equality
- Training for all managers who are involved in contracting and procurement should be carried out as soon as possible

Score	2
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Appraise competency/behaviours to ensure that managers and staff are capable of implementing the Equality Standard, including the new strands of sexual orientation, religion or belief and age

The Council can demonstrate:

- Achievement of equality objectives and targets is incorporated into the Personal Development scheme for staff (PDPR)
- Understanding of equality and diversity is a requirement for staff

Areas for review and improvement:

- It is unclear whether managers and other staff are required to build action on equality and diversity into their individual work plans where appropriate
- More detailed guidance should be given to both managers and to non-managerial staff about what kind of equality improvement actions should be included in their Achievement and Development plans
- Capability and competence on the new equality strands is not yet robustly integrated into the appraisal system

Score	3
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Provide training for all staff on the detailed implementation of the Equality Standard, including action plans and updates on legal and other developments

The Council can demonstrate:

- Guidance and training is in place for those engaged with recruitment.
- Equalities is part of the induction package
- The Council has an extensive programme of diversity training for all employees of the Council.
- There is an online presentation on equality and diversity on the intranet
- All managers have been trained for working with the Equality Standard, for example team leaders in Highways & Transportation attended a two day awareness course
- The Disability Confident training is being rolled out across the Council.
- There is training on equality impact assessment
- There is a 360 degree feedback process whereby staff can feed back to managers on all matters, including equalities

Areas for review and improvement:

- Review general state of staff training on equalities and equality improvement, to see whether it has gone beyond general equality awareness training to include both awareness of the Equality Standard and of equality improvement processes

- There is a review of the Chief Executives induction process to incorporate equalities and diversity
- The on line equalities presentation is to be updated to include the 3 equality schemes.
- There is less evidence of training on the strands of gender in particular, sexual orientation, religion/belief or age, with for example reference to one staff member in Finance and Business Support having attended a sexual orientation seminar.

Score	3
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Ensure that Local Government Workforce Strategies address equality Issues

The Council can demonstrate that:

- Its workforce HR strategies fully address equalities issues
- Equality is included in the Personnel handbook
- All employees are given the handbook at induction,
- The intranet A-Z, holds all policies.
- Staff documentation contains appropriate content
- Staff have received equality training

Areas for review and improvement:

- None identified

Score	4
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Build equality objectives and targets into management appraisal mechanisms

The Council can demonstrate that:

- Equality objectives and targets are robustly part of the management appraisal PDPR process

- Equalities are part of the regular PDPR staff review process, where understanding is checked
- There is a 360 degree feedback process whereby staff can feed back to managers on all matters, including equalities

Areas for review and improvement:

- None identified

Score	4
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Provide information and appropriate training on action plans to support scrutiny process.

The Council can demonstrate:

- EDAT has received training on monitoring and scrutiny

Areas for review and improvement:

- Provision of regular support and information for both internal and external stakeholder groups needs to be in place so that they can to fulfill a scrutiny role

Score	2
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Establish a system of guidance and training on relevant equality issues to short-listing panels and interviewers

The Council can demonstrate:

- Staff involved in shortlisting and interviewing have received interview skills training
- Guidance documentation is in place

Areas for review and improvement:

- Staff involved in shortlisting and interviewing should receive specific equality training relevant to shortlisting and interviewing processes.
- The assessors agree, that staff are in receipt of training, but it is less clear whether training on equalities meets the demands and requirements of the Equality Standard, and it is recommended that training plans and content is reviewed to properly assess this

Score	3
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Start action on all employment and pay targets

The Council can demonstrate:

- An equal pay audit has been completed, which showed no significant gender imbalance
- There are initiatives underway for improving equality in employment
- There are positive action initiatives to recruit more BoME social workers+

Areas for review and improvement:

- It is unclear how the equality in employment initiatives are being monitored and are progressing

Score	3
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7. Maintaining equality improvement

7.1 Consolidating performance at Level 3

In discussing what will be required to move forward to Level 4, we have outlined below a range of actions that should be undertaken to consolidate Level 3 work

- The gender equality scheme could be strengthened
- There could be a better defined focus on gender issues across the whole Authority
- There is some work to be done to achieve consistency in the equality impact assessment process. The quality of equality impact

assessments was variable leading to equivalent variability in the quality of objectives and targets. Attention should be paid to impact assessment team membership, the quality of data used including that derived from recent consultation and engagement exercises. More attention should be paid to providing summaries of reports for external challenge groups and to publishing impact assessment reports on the Council website.

- Many of the equality objectives contained in equality action plans relate to review and information collection. To move beyond level 3, all service areas should be setting SMART outcome targets that aim to improve services being delivered to equality groups.
- There are no detailed corporate guidelines on monitoring. These need to be produced as quickly as is practical.
- There are some good examples of equality data collection. These examples, however do not yet amount to monitoring against the achievement of objectives nor the meeting of targets.
- Each service area should produce plan to show how it is going to integrate equality monitoring into its more general systems for performance managing its service delivery. Support will be required from the EDAT and from the monitoring sub-group. A plan should be produced by each service area should to show how it is going to integrate equality monitoring into its more general systems for performance managing its service delivery.
- The Council should ensure that the widest range of input possible is received from these both internal and external stakeholder groups to improve the opportunity for external challenge for all elements of equality work.
- The foundations for good equality in procurement practice are to be found in *Equalities in Procurement*. The Council will need to back these proposals up with clear plans for compliance practice to ensure that the equality requirements and conditions laid down in contracts with organisations that supply goods to the Council are met.
- The Council is considering appointing Gypsy and Traveller champions from each political party. We strongly support this proposal.
- The customer segmentation model should be kept under review to ensure that it is delivering a view of the service user base that meets the needs of all the quality strands

In general and taking account of the evidence so far presented by the Council, the assessors feel that the Council is well placed to proceed to Level 4 subject to addressing the issues identified above.

7.2 Maintaining Improvement and Achieving Level 4

To achieve Level 4 of the Equality Standard a Council will have to show that it has achieved progress against the Level 3 targets that it set for race, gender and disability, and, that by 2009 it has achieved progress across the Authority for sexual orientation, age, religion and belief.

As well as the two criteria set out above the general requirements for Level 4 that an Authority will have to demonstrate are:

- It has developed information and monitoring systems that will allow it to assess progress in achieving targets
- It is measuring progress against targets and effectively using it's information and monitoring systems
- Monitoring reports are being produced at specific intervals and circulated to designated consultation and scrutiny groups
- It is using the self assessment process to review and revise targets and it's monitoring and consultation systems
- Self assessment includes the involvement of designated staff, community and stakeholders groups and seeks external validation through community involvement, peer review or expert opinion
- It has continued to carry out impact assessments for new policies and where gaps are identified through self assessment
- It has initiated a new round of action planning and target setting
- Monitoring systems are providing useful information towards specific target.

Specifically the Council needs to address the following:

Leadership and Corporate Commitment

- Maintenance of the performance management of equality action plans so that corporate equality management is able to track those service areas that are performing well and equally those areas that are lagging behind.
- The Council has set in place a clear system for the systematic integration of the Equality Standard. The Council should seek particularly to make its corporate assessment of service area monitoring and self-assessment information more robust. For level 4 it will need to demonstrate that it is able to assess the adequacy of the systems/ monitoring/information at a service level. We would suggest that the equality management bodies within the Council work with service managers on the development of this capacity
- Start to establish and self assess targets for sexual orientation, religion and belief and age. This will enable the council to be well on the way to addressing and taking a more consistent approach to the range of equality areas as required by changing legislation, and the Equality Standard deadline of 2009, as well as making improvements in line with the requirements of audit and inspection regimes.

Consultation and Community Development and Scrutiny

- The Council should improve its systems for review and scrutiny of service delivery and employment reports by designated consultation and community groups. The assessors are of the view that the council has done much to make links with such groups, however some of the evidence suggests that this area could be much better developed so that groups are more engaged in a two-way process with the council. There is evidence that the council has acknowledged that it could do more to engage with groups that are currently under-represented or have a low profile within the consultation framework. New targets and action plans should be developed with greater involvement of stakeholders

Service Delivery and Customer Care

- Some equality areas need to address gaps (that are recognised in the authority self-assessment document) to ensure consistency and equality of application and access for customers and staff
- Development of robust monitoring systems for all aspects of service delivery including those services delivered by other organisations on behalf of the Authority (to include developing the recording of equality groups which have not been previously been extensively used).
- Service managers to be fully involved in the self-assessment process, review and revise targets and monitoring and consultation systems .Improve sophistication around equality monitoring in those area where data is available/collected.
- Service delivery monitoring reports to be circulated to and shared with all designated stakeholder groups.
- Address known gaps in some equality areas to ensure consistency and equality of application and access for all customers and staff across the range of the six equality strands.

Employment and Training

- Develop the work on monitoring the overall effects of the equal pay scheme.
- Develop clear programmes of positive action to address workforce representation
- Review training needs against service action plans and revises future training plans to support delivery of appropriate competencies/behaviour.
- Producing regular monitoring reports to internal and external stakeholders, from which intelligent decisions can be made about the right way forward for the Council, is key to working at Level 4.
- As well as providing data on workforce profile and 'quality of life' at work, reports should be able to tackle more tricky issues of retention,

- effectiveness of (or barriers created by) appraisal, and job segregation. Wide circulation of reports and an open approach to dialogue with stakeholders will enable thorough scrutiny, and should result in employment conditions and schemes that are effectively keyed in to local needs and concerns in the County
- Strengthen the relationship with the staff equality groups and listen more closely to their concerns

8. Conclusion

The assessors conclude that South Gloucestershire Council is working at Level Three of the Standard. The three elements of the assessment: the self assessment document, the supporting evidence and the interviews provided a consistent view of the Council's achievements and where it still needs to improve. In particular it should be noted that during interviews staff were both enthusiastic and well-informed about improving the way in they deliver services and employ staff, seeing equalities as part of "How we do things here" There was clear indication that equalities was not an after thought, but part of the way things were done in South Gloucestershire

There is a sound management and performance review structure in place, which can drive, guide and scrutinise equality improvement work. It is crucial that this structure is maintained and develops its capacity to oversee progress to Levels 4 and 5

The assessors recommend that the Council receive the Equality Mark © Certificate for Level 3 achievement.

9. Acknowledgements

Thanks are due for efficient organisation to Tony Higgins

10. Assessors

This assessment was conducted and carried out by, Dr Julian Clarke and Dr Diana Parkin Centre for Local Policy Studies.

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